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FINAL ENVIRONMENTAL IMPACT REPORT

This document comprises the second and final part of the Environmental Impact Report (EIR) for this project. The Draft EIR, previously circulated for public review and comment, comprises the first part, and is available for review at the Department of City Planning, Environmental Review Section, 221 North Figueroa Street, Room 1500, Los Angeles, CA 90012.

Harbor Gateway District Plan
Fifteenth Council District

EIR No. 96-0090-SUB(ZV)(CUB)(DA)
STATE CLEARINGHOUSE No. 96051050

Vesting Tentative Tract No. 52172

HARBOR GATEWAY CENTER

PROJECT: The demolition of approximately 2.4 million square feet of industrial/warehouse facilities and construction of about 3 million square feet of retail, office, and industrial park development on a 170-acre site located on the south side of 190th Street, between Normandie and Western Avenues. Area 1, which occupies the northernmost 42 acres of the site, is to be developed with a maximum of 450,000 square feet of retail uses, including about 355,000 square feet of large scale retailers, a maximum 65,000 square foot (4,000 seat) movie theater complex, and up to 30,000 square feet of restaurants. Area 2, which occupies the remainder of the site, is to be developed with up to 500,000 square feet of office uses and up to 2 million square feet of industrial park uses.

REQUIRED CITY ACTIONS:

- Vesting tentative tract map
- Conditional Use Permits (CUP) for the sale of alcoholic beverages in conjunction with restaurant and retail uses and for Floor Area Ratio (FAR) averaging
- Development Agreement
- Significant modification from sign regulations for two signs
- Variance or other entitlement for shared parking in Area 1
- Building permits
- Any other ministerial actions or approvals required

APPLICANT: McDonnell Douglas Realty Company
4060 Lakewood Boulevard
Long Beach, CA 90808

DATE: May 1997

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I. SUMMARY

A. BRIEF SUMMARY OF THE PROPOSED PROJECT

The proposed project involves approval of a subdivision (Vesting Tentative Tract No. 52172) and implementation of a redevelopment and reuse program for a former aircraft manufacturing site involving the demolition of approximately 2.4 million square feet of industrial/warehouse facilities and construction of about three million square feet of retail, office, and industrial park development on a 170-acre site. The applicant proposes to divide the site into up to 44 lots to be developed in two areas: Area 1 to be developed with retail uses; and Area 2 to be developed with office/industrial park uses. The retail center proposed for the northernmost portion of the site along the 190th Street frontage would include an estimated 355,000 square feet of large scale retailers, a maximum 65,000 square foot (4,000 seat) movie theater complex, and up to 30,000 square feet of restaurants, for a total of 450,000 square feet of floor area. The remainder of the site would be developed with about 500,000 square feet of office uses and two million square feet of industrial park uses. All proposed development would be consistent with the current M3-1 zoning for the project site.

The project would require discretionary approvals and permits from the City of Los Angeles, including the following:

- Vesting tentative tract map (No. 52172);
- Conditional Use Permits (CUP) for the sale of alcoholic beverages in conjunction with restaurant and retail uses and for Floor Area Ratio (FAR) averaging;
- Development Agreement;
- Significant modification from sign regulations for two signs; and
- Variance or other entitlement for shared parking in Area 1.

Required ministerial approvals may include:

- Building permits; and
- Any other ministerial actions or approvals required.

B. PROJECT LOCATION

The project site is located within the Harbor Gateway community of the City of Los Angeles. It is about fourteen miles southwest of downtown Los Angeles and eight miles north of Los Angeles Harbor. The site is bounded by 190th Street on the north, Normandie Avenue on the east, industrial and residential properties on the south, and the Capitol Metals Company and former International Light Metals properties and Western Avenue on the west. Properties directly across Normandie Avenue from the project site are in unincorporated Los Angeles County while properties across Western Avenue are within the City of Torrance.

C. PROJECT BACKGROUND

The project applicant, McDonnell Douglas Realty Company, submitted an Environmental Assessment Form (EAF) to the City of Los Angeles Department of City Planning on March 21, 1996. After review of the information provided, the City's Environmental Staff Advisory Committee (ESAC) determined that the proposed project may have a significant impact on the environment. The ESAC directed that an Environmental Impact Report (EIR) be prepared to address the potential impacts of the project. On April 29, 1996, the ESAC notified the project Applicant that the following issue areas must be evaluated in the EIR:

- Earth: Grading, Drainage and Geological Hazards
- Air Quality (Stationary and Mobile Sources)
- Water: Surface Water Hydrology and Drainage
- Plant Life
- Noise (Stationary and Mobile Sources)
- Light and Glare
- Land Use
- Transportation/Circulation/Driveway/Access/Regional Traffic
- Public Services: Police and Fire Protection
- Energy Conservation: Electrical Power, Natural Gas, Construction
- Utilities: Communications, Water, Sewer, and Solid Waste
- Risk of Upset: Soil and/or Groundwater Contamination Issues
- Aesthetics

A copy of the ESAC comments and the Initial Study prepared by the Department of City Planning staff are included in Section XI, ESAC Action, Initial Study, and Worksheet/EAF of the Draft EIR.

Environmental Review Section staff initiated a Notice of Preparation (NOP) circulation process in which responsible agencies and interested parties were invited to submit comments on the EIR scope on May 7, 1996. The 45-day NOP circulation period ended on June 21, 1996.

A Draft EIR was completed and circulated for public review on February 6, 1997. The 45-day Draft EIR circulation period ended on March 24, 1997. The Draft EIR, as previously circulated for public review and comment, comprises the first part of the EIR for this project. The Final EIR comprises the second and final part of the EIR for this project.

D. AREAS OF PUBLIC CONTROVERSY

Areas of potential public controversy are environmental issue areas for which significant and unavoidable impacts would occur as a result of project implementation. For the Harbor Gateway Center project, these include air quality, transportation/circulation, and solid waste. Air pollutant emissions associated with project construction of the proposed project would exceed the South Coast Air Quality Management District (SCAQMD) significance thresholds for nitrogen oxides (NOx) and fine particulate matter (PM10). Energy use and vehicle trips associated with operation of the project would generate emissions of carbon monoxide (CO), reactive organic gases (ROG), and NOx that exceed the SCAQMD significance thresholds for those pollutants. However, localized CO impacts at area intersections would be below SCAQMD thresholds. Although both construction and operational emissions could be substantially reduced through implementation of recommended measures, neither could be reduced to below significant levels. Project-related traffic would create a significant and unavoidable impact at the Western Avenue/190th Street and Normandie Avenue/190th Street intersections, as well as on area freeways. Again, although recommended mitigation measures, including cumulative programs such as regional transit system improvements, ridesharing requirements, and regional roadway capacity enhancements, would reduce impacts at these locations, impacts would remain above significance thresholds. Solid waste generated by the proposed project would constitute a relatively small proportion of overall solid waste generated in the City of Los Angeles. However, because of ongoing concerns about the shortage of available landfill capacity in the region, any increase in solid waste generation is considered significant.

E. SUMMARY OF PROJECT IMPACTS

The impacts of the proposed project are summarized in Table 1, beginning on page 5.

Table 1
SUMMARY CHART

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
A. EARTH		
An estimated 473,300 cubic yards of earth would be graded during project construction, 421,100 cubic yards of which would be imported fill material. The depth of excavation would be less than the depth to groundwater, which lies 80-90 feet below the surface level. In addition, no distinct or prominent geologic features would be affected by on-site grading and on-site grading would be conducted in accordance with applicable regulations to minimize erosion. Therefore, grading and erosion impacts are considered less than significant.	1. All grading shall be performed in accordance with the current City of Los Angeles Building Code and the requirements of the responsible agencies including, but not limited to, the Department of Building and Safety and the Bureau of Engineering. 2. No on-site grading or import or export of earth materials to the project site shall commence or be performed without first obtaining a permit from the Los Angeles Department of Building and Safety. In accordance with Section B-164 of the Building and Safety Code, the following shall be conducted prior to issuance of a grading permit: (1) grading plans and specifications meeting all Department of Building and Safety requirements shall be prepared; and (2) evidence shall be provided that adjacent property owners have received a 30-day written notice of any pending excavation work to a depth deeper than the foundation of adjoining buildings and located closer to the property line than the depth of excavation. 3. Grading and excavation operations shall be conducted under the observation of a registered soils engineer or geologist. Grading plans for the site shall conform to the General Specifications for all Grading Plans promulgated by the City of Los Angeles Department of Building and Safety.	None.

Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
	4. Vegetation and demolition debris shall be removed and hauled from the site prior to the start of grading operations. 5. Any existing low density soils and/or saturated soils shall be removed under the inspection of the soils engineer/geologist. After the exposed surface has been cleansed of debris and/or vegetation, it shall be scarified until it is uniform in consistency, brought to the proper moisture content and compacted to a minimum of 90 percent relative compaction. 6. Overexcavation shall extend a minimum of five horizontal feet beyond all sides of the foundations or a distance equal to the depth of compacted fill placed, whichever is greater. 7. Any underground structures or utility lines encountered during grading shall be either removed or properly abandoned prior to the start of construction. 8. Any imported fill material shall be low to moderate in expansion potential, preferably granular or similar to the upper soils encountered at the project site. 9. Any imported fill material shall be approved by the project soils engineer/geologist. 10. Approved fill soils shall be placed in layers not in excess of six inches in thickness.	

Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
	11. Each lift shall be uniform in thickness and thoroughly blended, compacted to a minimum of 90 percent relative compaction, and approved by the soils engineer/geologist prior to the placement of the next layer of soil. 12. Fill soils shall be brought to within 15 percent of the optimum moisture content, unless otherwise specified by the soils engineer/geologist. 13. Compaction tests shall be conducted at a minimum of one test for every 500 cubic yards placed and/or for every two feet of compacted fill placed. 14. Final grade of structural areas shall be in a dense and smooth condition prior to placement of slabs-on-grade or pavement areas. 15. Minimum relative compaction shall be obtained in accordance with accepted methods in the construction industry. 16. No fill soils shall be placed, spread or compacted during unfavorable weather conditions. 17. When grading is interrupted by heavy rains, compaction operations shall not be resumed until approved by the soils engineer/geologist. 18. Adequate lateral support shall be provided for all adjacent improvements and structures at all times during grading operations and throughout the construction phase.	

Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
	19. The project structural engineer shall review all proposed loads to be imposed for further recommendations regarding slab thickness and steel reinforcement. 20. All retaining walls shall include a backfill zone of non-expansive material, consisting of a wedge beginning a minimum of one horizontal foot from the base of the retaining wall and extending upward at an inclination no less than 3/4 to 1 (horizontal to vertical). 21. All retaining walls shall be waterproofed and protected from hydrostatic pressure by a reliable permanent subdrain system. 22. All concrete slabs-on-grade shall be a minimum of five inches in thickness, reinforced a minimum of No. 4 bars eighteen inches in each direction, and positioned in the center of the slab. 23. Any concrete slabs with moisture sensitive floor coverings shall be underlain by an impervious membrane. 24. All concrete slab areas to receive floor coverings shall be moisture tested to meet all manufacturer requirements prior to placement. 25. Additional sulfate testing shall be performed at the conclusion of the rough grading operation to determine if special cement is required. If a high sulfate concentration is found, a non-corrosive cement mix such as Type 5 shall be used.	

Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
No known active or potentially active faults cross the project site. In addition, the potential for liquefaction at the site is very low because site soils are stiff in nature and because the depth to groundwater is greater than 50 feet. Project development would result in up to 6,170 additional employees and visitors on the site who could be exposed to earthquake hazards. The proposed mitigation measures would reduce the potential risks from seismic hazards to less than significant but would not eliminate them.	26. Design and construction of the proposed project shall include all requirements of the City of Los Angeles Building Code with respect to seismic safety and shall be approved by the City Department of Building and Safety prior to the issuance of building permits. 27. To assist in response to a seismic event, an emergency response and building-specific evacuation plan for project structures shall be developed and posted in each on-site building at the site. Such information shall be disseminated to occupants to reduce the potential for human injury.	None.
Cumulative Impact - Impacts related to geotechnical issues are localized on-site. With adherence to applicable building codes and good engineering practice in all development, no significant cumulative earth impacts would occur.		
B. AIR QUALITY		
Project construction would generate emissions of fugitive dust (PM10) and nitrogen oxides (NOx) that exceed SCAQMD daily and quarterly significance thresholds. Emissions of other criteria pollutants would not exceed threshold levels. Nevertheless, construction impacts are considered significant.	1. The Applicant shall secure any necessary permits from the SCAQMD, including an approved fugitive dust emissions control plan pursuant to SCAQMD Rule 403, as amended. 2. Non-toxic soil stabilizers shall be applied according to manufacturers' specifications or vegetation shall be planted on all inactive construction areas (previously graded areas inactive for thirty days or more and not scheduled for additional construction activities within twelve months). Permanent landscaping shall be installed upon completion of construction.	Recommended measures would reduce construction emissions to the degree feasible. Nevertheless, construction-related emissions of PM10 and NOx would remain above SCAQMD significance thresholds.

Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
	3. Areas graded shall be wetted down sufficiently to form a crust on the surface, with repeated soaking as necessary to maintain the crust and to prevent dust from being raised by on-site operations, using water trucks or sprinkler systems. Further, construction areas shall be wetted down in the late morning or after work is completed for the day. 4. All grading activities shall cease during second stage smog alerts and periods of high winds (i.e. greater than 25 mph) if dust is being transported to off-site locations and cannot be controlled by watering. 5. All trucks hauling dirt, sand, soil, or other loose materials off-site shall be covered or wetted or shall maintain at least two feet of freeboard (i.e., minimum vertical distance between the top of the load and the top of the trailer). 6. A construction relations officer shall be established by the Applicant to act as a liaison with neighbors and residents concerning on-site construction activity, including resolution of issues related to PM_{10} generation. 7. All construction roads within the project site that have a traffic volume of more than 50 daily trips by construction equipment, or 150 total daily trips for all vehicles, shall be surfaced with base material or decomposed granite. 8. Streets shall be swept at the end of the day if visible soil material has been carried onto adjacent public paved roads (reclaimed water shall be used if available.)	

Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
	9. Construction equipment shall be inspected prior to leaving the site and loose dirt shall be washed off with wheel washers as necessary. 10. Water or non-toxic soil stabilizers shall be applied, according to manufacturers' specifications, as needed to preclude off-site transport of fugitive dust from all unpaved staging areas and unpaved road surfaces. 11. Traffic speeds on all unpaved roads shall not exceed 15 mph.	
The combined mobile and stationary source emissions associated with operation of the proposed project would exceed SCAQMD operational thresholds for NOx, carbon monoxide (CO), and reactive organic gases (ROG). The proposed project's operational impacts are therefore considered significant.	12. The Applicant or future owners of property within the project subdivision shall provide public education regarding the importance of reducing vehicle miles traveled and the related air quality impacts through the use of brochures, classes, and other informational tools. 13. On-site office/industrial park development shall provide preferential parking for high occupancy vehicles and alternative fuel vehicles, as well as other forms of parking management that would encourage higher vehicle occupancy rates. 14. Project occupants shall comply with SCAQMD Rule 2202, which applies to any employers who employs 100 or more employees on a full or part-time basis at a worksite. This rule, which aims to reduce volatile organic compounds (VOCs), No_x, and CO, provides employers a menu of options that they can choose from to implement and meet the emission reduction target for their worksite.	Recommended measures would reduce operational emissions to the degree feasible. Nevertheless, operational emissions of NOx, CO, and ROG would remain above SCAQMD significance thresholds.

Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
	15. The Applicant or future owners within the project subdivision shall, as feasible, schedule deliveries during off-peak periods in order to encourage the reduction of trips during the most congested periods.	
The increase in vehicle trips to and from the site associated with the proposed project would increase concentrations of carbon monoxide along area roadways, particularly at heavily congested intersections. However, the increase in CO levels associated with the proposed project would be less than the SCAQMD significance threshold level. Local area impacts are therefore considered less than significant.	None required.	None.
The proposed project is consistent with growth projections contained in the 1994 AQMP, as well as with SCAQMD, SCAG, and City of Los Angeles policies related to land use and air quality.	None required.	None.

Cumulative Impact - The proposed project is consistent with the growth projections upon which the 1994 AQMP is based. It would also serve to implement a number of SCAQMD and SCAG policies designed to reduce vehicle miles traveled and improve regional air quality. Nevertheless, air pollutant emissions related to cumulative development would contribute to the high pollutant levels projected for the region.

Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
C. SURFACE WATER		
Although the proposed project is not anticipated to increase the rate or amount of stormwater flows from the site, the on-site storm drain system would be upgraded in conjunction with project buildout to address existing deficiencies. Localized flooding could occur on-site under severe weather conditions (i.e., 50-year storm); however, on-site or off-site retention would be designed to avoid damage to any on and off-site structures. Therefore, no significant impacts are anticipated.	1. The Applicant shall prepare detailed flood control plans for the City of Los Angeles Department of Public Works and Los Angeles County Flood Control District, including hydrology/hydraulic calculations and drainage improvement plans, showing quantitatively how projected stormwater runoff would be adequately conveyed to off-site storm drain facilities. Such plans shall be approved by the City and LACFCD prior to issuance of building permits. 2. All major and minor drainage infrastructure shall be designed and constructed per applicable design standards. All designs shall be submitted to the City of Los Angeles Department of Public Works for review and approval, prior to issuance of building permits. 3. The Applicant shall implement on-site retention that is capable of detaining the difference between runoff from the 50 year storm and discharge of 1.0 cfs per acre.	None.
On-site construction could adversely affect surface water quality through the following: (1) discharges related to the storage, handling, use, and disposal of chemicals; and (2) increased sediment transport due to erosion. Each of these potentially impacts is considered potentially significant.	In order to avoid piecemeal effects, all lots approved under Tract No. 52172 shall comply with the following mitigation measures (No. 4, 5 and 6) regardless of size:	

Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
	4. Prior to issuance of grading permits, the Applicant shall file a Notice of Intent with the State Water Resources Control Board and shall develop and implement a Storm Water Pollution Prevention Plan, monitoring program, and reporting plan for the construction period, in accordance with National Pollution Discharge Elimination System general construction permit requirements. 5. The Applicant shall conduct inspections of the site before and after storm events to determine whether control practices to reduce pollutant loadings identified in the Storm Water Pollution Prevention Plan are adequate and properly implemented. 6. Future projects within the office/industrial park component of the proposed project shall comply with the requirements of the NPDES general permit for solid waste discharges. Compliance shall be certified by the Regional Water Quality Control Board prior to issuance of building permits.	None.

Cumulative Impact - Cumulative development in the site vicinity could add to the current shortfall in drainage capacity, as well as potentially degrading surface water quality in the area. However, the proposed project would not increase the quantity of stormwater runoff, nor would it significantly affect stormwater quality. The project's contribution to cumulative impacts to the local drainage system and to surface water quality is therefore considered less than significant.

Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
D. PLANT LIFE		
Project implementation would involve the removal of all landscaped and remnant ruderal areas on-site. However, no sensitive plant or wildlife species or communities inhabit the site. In addition, landscaping associated with the project would greatly exceed the amount of landscaping currently on-site. No significant impacts to plant life are anticipated.	1. All existing on-site trees (32 trees) that would be removed in conjunction with project buildout shall be replaced at a minimum ratio of 1:1. 2. All open areas on-site that are not used for buildings, walkways, and other hardscape shall be landscaped.	None.
Cumulative Impact - The proposed project, together with related projects in the site vicinity, represents the redevelopment of already disturbed lands in a heavily urbanized area. Because such development would not be expected to disturb any sensitive plant communities, no significant cumulative impacts are anticipated.		
E. NOISE		
Project construction activity would have the potential to generate noise levels that exceed the 75 dBA level allowed for construction under the City Noise Ordinance. Nearby receptors that may be affected by construction noise include residential properties to the south, nearby commercial and industrial uses, and on-site uses. Construction-related impacts are considered potentially significant.	1. On-site construction activity that generates noise in excess of 75 dBA at a distance of 50 feet shall be limited to between 7:00 A.M. and 6:00 P.M. Monday through Friday and 8:00 A.M. and 6:00 P.M. on Saturdays. 2. All construction equipment shall be in proper operating condition and fitted with standard factory silencing features. 3. Sound blankets shall be used on all construction equipment for which use of sound blankets is technically feasible.	None.

Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
	4. A construction relations officer shall be established by the applicant to act as a liaison with neighbors and residents concerning on-site construction activity. If noise levels from construction activity are found to exceed 75 dBA at the property line and construction equipment is left stationary and operating for more than one day, a temporary noise barrier shall be erected between the noise source and receptor. 5. Any other noise reduction measures deemed technically feasible by the City of Los Angeles at the time of any specific construction project shall be implemented. 6. During construction, the project shall comply with applicable Sections 112.03 of City Noise Ordinance Nos. 144,331 and 161,574 and subsequent ordinances.	
Project operation would not be expected to include any significant noise-generating activities on-site. A proposed 8-foot sound wall at the southern end of the site would minimize noise impacts to adjacent residences. Noise from adjacent operations (Capitol Metals Company), though audible on-site, would not be expected to significantly affect project operations.	None required.	None.

Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
Vehicle movement associated with project operation would increase noise levels along roadways in the site vicinity. However, in no case would the increase in vehicular noise be greater than 0.4 dBA. Such noise level increases would not discernable above ambient noise levels and are considered less than significant. Portions of the site along major roadways (190th Street, Normandie Avenue, Western Avenue) would, however, be exposed to traffic noise exceeding clearly acceptable levels. This is considered a potentially significant impact.	7. In order to ensure a suitable interior noise environment in all on-site uses, appropriate sound attenuation features shall be incorporated into the design of any retail uses proposed within 200 feet of 190th Street, any industrial park uses proposed within 100 feet of either Western Avenue or Normandie Avenue, and any office uses proposed within 400 feet of either Western Avenue or Normandie Avenue. Such features as closed windows and fresh air supply systems or air conditioning will normally suffice. 8. A minimum 8-foot high thematic wall shall be constructed between the southern boundary of Area 2 and adjacent residential properties as individual lots in this area are developed. Graffiti resistant paint shall be utilized on both sides of the wall. 9. Buildings within lots located adjacent to the residential area south of the project site shall be set back a minimum of 25 feet from the southerly property boundary of the project site.	None.

Cumulative Impact - Traffic associated with proposed project and cumulative development in the area would increase noise levels along major roadways in the area. Such increases would represent an adverse cumulative impact. However, because noise level increases would be less than level considered discernable (3 dBA) on all roadways, cumulative impacts are considered less than significant.

Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
F. LIGHT AND GLARE		
F.1 Light		
Lighting associated with the proposed project would be perceptible from off-site and would increase ambient light levels in the site vicinity. However, lighting would generally be directed inward and would be reduced by minimum landscape parkway requirements for the site. The 45-foot maximum building height in the southwestern portion of the site and proposed 8-foot project theme wall at the southern site boundary would further reduce lighting impacts to adjacent residences. No significant lighting impacts are anticipated.	1. The project applicant shall comply with all applicable exterior lighting limitations of the City of Los Municipal Code. 2. All outdoor lighting shall be shielded and directed downward to the greatest extent possible taking into account the function of the proposed lighting. 3. Mercury-vapor street light fixtures shall not be utilized on any public or private streets included within the project. 4. Mercury-vapor exterior light fixtures shall not be utilized for outdoor lighting, unless substantial evidence supporting the need for mercury-vapor is presented to the Department of Building and Safety. 5. Effective structural and/or vegetative screening shall be provided between sensitive land uses (i.e., the 203rd Street residential area) and all parking lot/ structure lighting or other large area, high-intensity broadcast lighting sources. 6. Exterior lighting shall be designed such that illumination is confined to the project site or confined to areas which do not include sensitive uses.	None.

Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
	7. Exterior windows shall be tinted or contain a light-reflective film to reduce visible illumination levels from the building. Windows facing residential areas shall be constructed such that they are not allowed to be opened. Developers of future projects within the proposed subdivision shall consult with the Department of Water and Power regarding light-reflective film which would not interfere with energy conservation goals. 8. Within 300 feet of the property lines of adjacent residences on the north side of 203rd Street, on-site building height shall be limited to 45 feet. 9. A minimum 8-foot high thematic wall shall be constructed between the project site and adjacent residential properties to the south. Graffiti resistant paint shall be utilized on both sides of the wall. 10. Buildings shall be set back a minimum of 25 feet from the southerly property line of the project site.	
F.2 Glare		
The use of concrete, metal panels, and limited reflectivity glass in building construction, coupled with landscape setbacks for the entire property, would minimize the potential for glare effects upon adjacent roadways. The potential for nighttime glare effects on adjacent residences would be minimized by the 8-foot them wall proposed for the southern site boundary. No significant glare impacts are anticipated.	None Required.	None.

Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
Cumulative Impact - The extent of cumulative light and glare impacts cannot be fully determined at this time because project-specific lighting specifications have not been developed for all related projects. Such increases in light and glare would, however, represent incremental additions within the context of a highly urbanized environment. Moreover, all individual projects will be subject to mitigation requirements on a case-by-case basis.		
G. LAND USE		
The proposed project would be allowed under the existing General Plan land use designation (Heavy Industrial) and zoning (M3) for the site. It would also serve to implement several policy objectives of the City's General Plan Framework for areas designated as Regional Centers, as well as SCAG Regional Comprehensive Plan and Guide policies related to encouraging infill development that minimized the need for new infrastructure. No inconsistencies with local or regional land use policy are anticipated.	1. The applicant shall comply with all conditions for the Conditional Use Permit for FAR averaging. 2. The land use on-site shall be limited to that delineated in the chart on page ? of the Land Use Section (355,000 square feet of retail; 65,000 square feet of theater (4,000 seats); 30,000 square feet of restaurant; 507,000 square feet of office; 2,010,700 square feet of industrial park) and this limitation shall be recorded in a covenant and agreement and Development Agreement, if any.	None.
The proposed project components would be internally compatible and would generally be compatible with the mix of uses in the site vicinity. The addition of retail and office/industrial park uses would be consistent with ongoing land use trends in the area. Although on-site development could create compatibility conflicts with adjacent residences, such conflicts would be minimized through various design features, in combination with measures to mitigate impacts related to localized air quality, noise, light and glare, human health, and aesthetics. No significant compatibility conflicts are anticipated.	3. The applicant shall implement all mitigation measures as defined in Sections IV.A, Earth, IV.E, Noise, IV.F, Light and Glare, IV.H, Transportation/ Circulation, and IV.L, Hazardous Materials.	None.

Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
Cumulative Impact - The proposed project would contribute to an ongoing trend in the area away from industrial development and toward retail, office, and industrial park uses. By and large, this shift would not create any significant compatibility conflicts and may, in some instances, create land use patterns more compatible with nearby residential uses. Any compatibility conflicts associated with individual projects would be addressed on a case-by-case basis. No significant cumulative land use impacts are anticipated.		
H. TRANSPORTATION/CIRCULATION		
Project operation would result in significant traffic impacts at 30 of 41 study intersections during the morning and/or evening peak hours. It would also incrementally add to congested conditions on area freeways, resulting in significant impacts at up to 3 freeway locations.	1. Compliance with Ordinance No. 168,700 (Transportation Demand Management and Trip Reduction Measures). This ordinance focuses on incorporating TDM facilities into the design of new buildings to promote alternative modes of transportation (see Appendix F). It shall be followed in the design and construction of the project site and buildings. 2. Compliance with SCAQMD Rule 2202. The South Coast Air Quality Management District (SCAQMD) has adopted a rule designed to reduce the air pollution impacts of commute trips. This rule, unlike the rules it replaces, does not mandate trip reduction programs but allows individual employers to select from a variety of options. Most employers have, however, continued to select ridesharing programs as the most cost-effective method of reducing air quality impacts. If site employers implement these trip reduction measures, 15 percent or more of the peak hour traffic generation from the office/industrial park component of the project could be eliminated.	With the recommended mitigation measures, impacts at most locations would be reduced to a less than significant level. However, significant impacts would remain at four intersections (Western Avenue/190th Street and Western Avenue/Torrance Boulevard during A.M. and P.M. peak hours, and Western Avenue/Carson Street and Western Avenue/Pacific Coast Highway during A.M. peak hour only), as well as on area freeways. Cumulative programs, such as transit system improvements, ridesharing requirements, and regional capacity enhancements, would further mitigate, but not eliminate, these impacts.

Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
	3. Bus Transit Improvements. The applicant should work with the appropriate transit districts (i.e., Gardena Transit, Torrance Transit and MTA) to improve transit service to the site. Further, sidewalks throughout the site should be designed to provide attractive pedestrian routes to and from transit stops. 4. Hawthorne Boulevard and 190th Street -- Restripe 190th Street and restrict parking to convert the existing eastbound and westbound right-turn-only lanes to through/right optional lanes. Modify the signal to remove the existing eastbound right-turn phase. 5. Crenshaw Boulevard and 190th Street -- Remove median islands, restripe and restrict parking along 190th Street to convert the existing eastbound and westbound right-turn-only lanes to through/right optional lanes. 6. Crenshaw Boulevard and Del Amo Boulevard-- Restripe Del Amo Boulevard and modify the traffic signal to provide two left-turn-only lanes, a through/ left optional lane and a right-turn-only lane in the westbound direction. 7. Western Avenue and Artesia Boulevard-- Restripe Western Avenue and restrict parking to convert the existing northbound and southbound right-turn-only lanes to through/right optional lanes.	

Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
	8. Western Avenue and San Diego Freeway Northbound On/Off- Ramps -- Widen and restripe the off-ramp to from two lanes to three lanes to provide two left-turn lanes and a right-turn lane satisfactory to LADOT, Caltrans and the City of Torrance. 9. San Diego Freeway Southbound On/Off-Ramps and 190th Street -- Flare the west leg of the intersection, restripe 190th Street, restrict parking and modify the signal to provide dual left-turn lanes in the eastbound direction. 10. Western Avenue and 190th Street -- Any mitigation would require a reduction below 11 foot interior lane widths on a high speed state facility and/or acquisition of right-of-way. Therefore, no feasible mitigation is available. 11. Western Avenue and 195th Street -- The Applicant shall fund the installation of the Automated Traffic Surveillance and Control (ATSAC) System at this location satisfactory to LADOT. 12. Western Avenue and Del Amo Boulevard -- Restripe the eastbound approach for dual left-turn lanes and modify the signal to provide east-west opposed phasing, satisfactory to LADOT, Caltrans and the City of Torrance. The proposed mitigation should also include removal of the north crosswalk. The applicant shall also fund ATSAC installation at this location. This mitigation measure shall be implemented satisfactory to LADOT.	

Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
	13. Western Avenue and Torrance Boulevard -- Any mitigation would require removal of parking, narrowing of the median containing the railroad tracks or acquisition of additional right-of-way, none of which is considered feasible. Therefore, no feasible mitigation is available. 14. Western Avenue and Carson Street -- Mitigation of this impact would require removal of parking on ,Carson Street, for which there is a heavy demand. Therefore, no feasible mitigation is available. 15. Western Avenue and Sepulveda Boulevard -- Prohibit parking to add northbound and southbound right-turn lanes satisfactory to LADOT, Caltrans and the City of Torrance. The mitigation shall not include modification of the median islands on Western Avenue. The northbound right-turn lane can be installed utilizing existing red curb along the frontage of a mini-shopping center. 16. Western Avenue and Pacific Coast Highway -- Installation of mitigation would require interior lane width of less than 11 feet on a high speed state facility or an offsetting of lanes across the intersection. Therefore, no feasible mitigation is available.	

Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
	17. Project Roadway and 190th Street -- Remove the existing traffic signal on 190th Street and the McDonnell Douglas driveway approximately 1,300 feet west of Normandie Avenue and construct a new driveway and traffic signal at this location to serve the major north-south internal road, satisfactory to LADOT. Mitigation shall also include restriping 190th Street for three through lanes in both directions and a left-turn lane in the westbound direction.	
	18. Normandie Avenue and Artesia Boulevard -- Provide dual left-turn lanes in the southbound direction by restriping Normandie Avenue and modifying the signal.	
	19. Normandie Avenue and San Diego Freeway Northbound On/Off-Ramps -- Widen and restripe the northbound approach to provide two through lanes and an exclusive right-turn-only lane to facilitate freeway access. Fund ATSAC installation at this location.	

Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
	20. San Diego Freeway Southbound Off-Ramp/Project Driveway and 190th Street -- Flare and restripe 190th Street to provide three travel lanes and dual left-turn lanes in the westbound direction and three travel lanes and a "pre-left-turn lane" for Normandie Avenue in the eastbound direction. Construct the project driveway to provide dual left-turn lanes and a right-turn-only lane in the northbound direction. Install a signal with opposed northbound and southbound phasing. Fund ATSAC installation at this location. If a review of operations shows interference with operation of the signal at 190th Street and Normandie Avenue, LADOT shall restrict turn movements into and/or out of the project driveway.	

Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
	21. Normandie Avenue and 190th Street -- Relocate the railroad gates and remove the raised median island from the west leg of 190th Street, subject to approval by the California Public Utilities Commission (PUC). Without PUC approval there is insufficient roadway width to restripe 190th Street for dual left-turn lanes and three through lanes in both directions. Modify the signal to provide east-west left-turn signal phasing with a southbound right-turn overlap phase and fund the installation of ATSAC at this location. Install east-west left-turn signal phasing contingent on PUC approval to relocate the railroad gates so that 190th Street can be restriped for dual left-turn lanes and three through lanes in each direction. Install a southbound right-turn overlap signal and provide ATSAC funding at this location. This intersection is also under the jurisdiction of the Los Angeles County Department of Public Works. 22. Normandie Avenue and Project Roadway/Francisco Street -- Construct the project roadway and restripe the eastbound approach, for a left-turn lane, a through/left lane and a right-turn lane and modify the signal to provide opposed east-west phasing satisfactory to LADOT and the Los Angeles County Department of Public Works. 23. Normandie Avenue and Torrance Boulevard -- Fund the installation of ATSAC at this intersection satisfactory to LADOT. The South Bay Phase II ATSAC system is proposed for this location.	

Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
	24. Normandie Avenue and Carson Street -- Fund the installation of ATSAC at this intersection satisfactory to LADOT. The South Bay Phase II ATSAC system is proposed for this location. 25. Vermont Avenue and Artesia Boulevard -- Widen and restripe the northbound approach to Vermont Avenue for dual left-turn lanes. The additional left-turn lane can be installed within the existing 80 foot roadway width without any additional widening on Vermont Avenue. Provide a northbound right-turn phase overlapping the existing westbound left-turn phase. Install a northbound right-turn lane. This mitigation measure shall be implemented satisfactory to LADOT, Caltrans and the City of Gardena. 26. Vermont Avenue and 190th Street -- Restripe 190th Street to provide three lanes in each direction and fund the installation of ATSAC at this intersection, satisfactory to LADOT. 27. Vermont Avenue and Torrance Boulevard -- Restrict parking and restripe Vermont Avenue to provide a right-turn-only lane in the northbound and southbound directions, satisfactory to the Los Angeles County Department of Public Works. 28. Vermont Avenue and Carson Street -- Restrict parking and restripe Vermont Avenue to convert the existing eastbound right-turn-only lane into a through/right optional lane, satisfactory to the Los Angeles County Department of Public Works.	

Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
	29. Harbor Freeway Southbound Off-Ramp and 190th Street -- Restripe 190th Street to provide three travel lanes in the westbound directions, satisfactory to LADOT. Modify the signal to provide a southbound right-turn phase extension concurrent with the initiation of the eastbound through phase, satisfactory to LADOT and Caltrans. Fund the installation of ATSAC at this intersection.	
	30. Harbor Freeway Northbound On-Ramp and 190th Street -- Install a traffic signal at this location. Modify the median island, prohibit parking on the south side of 190th Street and restripe 190th Street to provide dual eastbound left-turn lanes, including an HOV lane in the inside left-turn lane and two through lanes, satisfactory to LADOT and Caltrans. The on-ramp shall be striped for two lanes and the inside lane on the on-ramp shall be designated as an HOV lane.	
	31. Figueroa Street and 190th Street -- Prohibit parking and add a right-turn lane on the southbound approach of Figueroa Street, satisfactory to LADOT and the City of Carson.	
	32. Hamilton Avenue and Torrance Boulevard -- Restripe Hamilton Avenue to provide a left/right optional lane and a right-turn-only lane.	

Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
	33. Figueroa Street and Torrance Boulevard -- Remove the sidewalk along the south curb, restrict parking and restripe Torrance Boulevard to provide a left-turn-only lane, a through/left optional lane, and through/right optional lane in the eastbound direction. Modify the signal to provide opposed east-west phasing. 34. Harbor Freeway Southbound On-Ramps and Carson Street -- Restripe Carson Street to provide a right-turn-only lane in the eastbound direction. 35. Crossing gates and signals will be installed or upgraded, as appropriate, at the two proposed new retail center driveways off of Normandie Avenue that cross the Southern Pacific Railroad tracks in accordance with State of California Public Utilities Commission standards. 36. The design of all internal roadways on the project site, off-site roadway improvements, sidewalks and associated improvements will be subject to the approval of the City of Los Angeles Bureau of Engineering. 37. A detailed site plan for the retail center shall be submitted to LADOT for approval, indicating the number of parking spaces to be provided and shared.	

Cumulative Impact - The analysis of project traffic impacts considers the effects of both background growth in the region and the related projects. Consequently, cumulative impacts are equivalent to those of the proposed project. After implementation of the recommended mitigation measures, the project, in combination with cumulative development, would contribute to significant impacts at four study intersections and on area freeways.

Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
I. PUBLIC SERVICES		
I.1 Fire Protection		
Although both project construction and project operation may cause minor delays in emergency response due to increased traffic in the site vicinity, neither would significantly affect Los Angeles Fire Department response times in the area. Access to the project site would be enhanced by the proposed project. The distance to the nearest fire station exceeds that maximum allowed under the City Fire Code; however, installation of fire sprinklers and other supplemental fire protection devices specified by the Fire Chief would compensate for this exceedance. Impacts are therefore considered adverse, but less than significant.	1. On-site development at the Harbor Gateway Center shall comply with all applicable State and local codes and ordinances, and guidelines found in the Fire Protection and Prevention Plan, as well as the Safety Plan, both of which are elements of the General Plan of the City of Los Angeles. 2. Definitive plans and specifications shall be submitted to the Los Angeles Fire Department and requirements for necessary permits shall be satisfied prior to commencement of any portion of the proposed project. 3. In order to mitigate the inadequacy of fire protection in travel distance, sprinkler systems shall be required throughout any structure to be built, in accordance with the Los Angeles Municipal Code, Section 57.09.07. 4. The applicant shall submit plans that show the access road and the turning area for Fire Department approval. 5. On-site development shall conform to the standard street dimensions shown on Department of Public Works Standard Plan D-22549.	

Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
	6. Standard cut-corners will be used on all turns. 7. During demolition, the Fire Department access will remain clear and unobstructed. 8. The width of private roadways for general access use and fire lanes shall not be less than 20 feet clear to the sky. 9. Fire lane width shall not be less than 20 feet. When a fire lane must accommodate the operation of Fire Department aerial ladder apparatus or where fire hydrants are installed, those portions shall not be less than 28 feet in width. 10. Where a cul-de-sac near a given development requires accommodation of a Fire Department apparatus, the minimum outside radius of the paved surface shall be 35 feet. An additional six feet of clear space must be maintained beyond the outside radius to a vertical point 13 feet 6 inches above the paved surface of the roadway. 11. No building or portion of a building shall be constructed more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane. 12. Adequate off-site public and on-site private fire hydrants may be required. Their number and location are to be determined after the Fire Department's review of the plot plan.	

Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
	13. The on-site water delivery system shall be improved to the satisfaction of the Fire Department prior to occupancy.	
	14. All first-story portions of any commercial building shall be within 300 feet of an approved fire hydrant.	
	15. Fire lanes and dead-ending streets shall terminate in a cul-de-sac or other approved turning area. No dead-ending street or fire lane shall be greater than 700 feet in length without a secondary access being provided.	
	16. All access roads, including fire lanes, shall be maintained in an unobstructed manner. The entrance to all required fire lanes or required private driveways shall be posted with a sign no less than three square feet in area in accordance with Section 57.09.05 of the Los Angeles Municipal Code.	
	17. At least two different ingress/egress roads for each area, that will accommodate a major fire apparatus and provide for major evacuation during emergency situations, shall be required.	
	18. Construction of any public or private roadway in the proposed development shall not exceed 15 percent in grade.	
	19. Where access for a given development requires accommodation of a Fire Department apparatus, overhead clearance shall not be less than 14 feet.	
	20. Access for LAFD apparatus and personnel to and into all structures shall be required.	

Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
	21. Additional vehicular access may be required by the LAFD where buildings exceed 28 feet in height. 22. Where a fire apparatus will be driven onto the road level surface of the subterranean parking structure, that structure shall be engineered to withstand a bearing pressure of 8,600 pounds per square foot. 23. The design, location, and operation of gates, if any are utilized within the industrial/office component of the project, shall be to the satisfaction of the LAFD and the Deputy Advisory Agency. Warning signs and lighting shall be installed and maintained satisfactory to the LAFD and the Department of Transportation. The names and phone numbers of the current officers of the property owners association (see Mitigation Measure 24) shall be submitted to the Fire Department, Police Department, and the Deputy Advisory Agency. All necessary permits shall be secured from the Department of Building and Safety and from other City agencies. 24. In order to provide assurance that the proposed common fire lanes and fire protection facilities for the project which are not maintained by the City are properly and adequately maintained, the subdivider shall record with the County Recorder, prior to the recordation of the final map, a covenant and agreement (Planning Department General Form CP-6770) to assure the following:	

Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
	• The establishment of a property owners' association which shall cause a yearly inspection to be made by a registered civil engineer of all common fire lanes and fire protection facilities. Any necessary maintenance and corrective measures will be undertaken by the association. Each future property owner shall automatically become a member of the association or organization required above and is automatically subject to a proportionate share of the cost. • The future owners of affected lots with common fire lanes and fire protection facilities shall be informed of their responsibility for the maintenance of the devices on their lots. The future owner and all successors will be presented with a copy of the maintenance program for their lot. Any amendment or modification that would defeat the obligation of said association as required hereinabove must be approved in writing by the Advisory Agency after consultation with the Fire Department. • In the event that the property owners' association fails to maintain the common property and easements as required by the CC and R's, the individual property owners shall be responsible for their proportional share of the maintenance. • Prior to any building permits being issued, the applicant shall improve, to the satisfaction of the Fire Department, all common fire lanes and install all private fire hydrants to be required.	

Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
	• The common fire lanes and fire protection facilities shall be shown on the final map. Plot plans showing fire hydrants and access for each phase of the project must be approved by the LAFD prior to the recording of the final map for that phase. Each phase shall comply independently with code requirements.	
I.2 Police Protection		
The proposed project may generate demand for additional police officers in order to maintain existing levels of service. Although project construction and operation may result in minor delays in emergency response due to increased traffic in the site vicinity, neither is expected to significantly affect response times. Although the impacts are not considered significant, impacts to police protection service are therefore considered adverse and are not eliminated.	1. Plot plans for all proposed commercial, office, and industrial development shall be submitted to the Los Angeles Police Department's Crime Prevention section for review and comment. Security features subsequently recommended by the LAPD, possibly including the provision of on-site security, shall be implemented to the extent feasible. 2. Building plans shall be filed with the LAPD Harbor Area Commanding Officer. Plans shall include access routes, building numbers, and any additional information that might facilitate prompt and efficient police response. Project developers within the project subdivision shall also consult with the LAPD with respect to other on-site security measures which will minimize demand for LAPD services. 3. Parking areas, entryways, lobbies, and elevators shall be well illuminated and designed with minimum dead space to eliminate areas of concealment.	None.

Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
	4. Alarms and/or locked gates shall be installed on doorways providing public access. 5. Landscaping shall not be planted in a way that could provide cover for persons tampering with doors or windows. 6. Additional lighting shall be installed where appropriate.	

Cumulative Impact - Cumulative development in the site vicinity and throughout the City could result in the need for increased staffing and equipment at the City Fire Police Departments. Cumulative impacts are therefore considered potentially significant. However, because the implementation of cumulative development projects would increase City revenues through sales taxes and increased property values, they would provide means to fund any necessary improvements in service. Cumulative impacts to both fire and police protection service are therefore considered less than significant.

J. ENERGY CONSERVATION

J.1 Electric Power

Full occupancy of the Harbor Gateway Center would increase on-site electricity consumption by about 21 million kilowatt hours per year. The Halldale receiving station has sufficient capacity to meet this increase in demand, while connections to existing distribution lines, with the exception of the 203rd Street line, could be established. Because adequate infrastructure would be provided, no significant impacts are anticipated.	1. The proposed project shall adhere to all applicable Los Angeles Department of Water and Power (DWP) rules and regulations. All necessary infrastructure improvements shall be constructed to meet the requirements of the DWP.	None.

Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
	2. Should SCE supply the site at buildout, the proposed project shall adhere to all applicable SCE rules and regulations. SCE shall take the necessary measures to ensure CPUC approval and CEQA compliance, for construction of any new facilities over 50 kV. It is the intent of this EIR to provide compliance with the public notice provision of CPUC General Order 131D for these facilities. 3. The proposed project shall comply with and implement all energy conservation measures required by Title 24 of the California Administrative Code, and, whenever feasible, exceed them. 4. Built-in appliances, refrigerators, and space-conditioning equipment should exceed the minimum efficiency levels mandated in the California Code of Regulations.	

Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
	5. Install high-efficiency air conditioning controlled by a computerized energy-management system in the office and retail spaces which provides the following: - A variable air-volume system which results in minimum energy consumption and avoid hot water energy consumption for terminal reheat; - A 100 percent outdoor air-economizer cycle to obtain free cooling in appropriate climate zones during dry climatic periods; - Sequentially staged operation of air-conditioning equipment in accordance with building demands; and - The isolation of air-conditioning to any selected floor or floors. - Consider the applicability of the use of thermal energy storage to handle cooling loads. 6. Cascade ventilation air from high-priority areas before being exhausted, thereby, decreasing the volume of ventilation air required. For example, air could be cascaded from occupied space to corridors and then to mechanical spaces before being exhausted. 7. Recycle lighting-system heat for space heating during cool weather. Exhaust lighting-system heat from the buildings, via ceiling plenums, to reduce cooling loads in warm weather.	

Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
	8. Install low and medium static-pressure terminal units and ductwork to reduce energy consumption by air-distribution systems. 9. Ensure that buildings are well-sealed to prevent outside air from infiltrating and increasing interior space-conditioning loads. Where applicable, design building entrances with vestibules to restrict infiltration of unconditioned air and exhausting of conditioned air. 10. A performance check of the installed space-conditioning system should be completed by the developer/installer prior to issuance of the certificate of occupancy to ensure that energy-efficiency measures incorporated into the project operate as designed. 11. Finish exterior walls with light-colored materials and high-emissivity characteristics to reduce cooling loads. Finish interior walls with light-colored materials to reflect more light and, thus, increase lighting efficiency. 12. Install thermal insulation in walls and ceilings which exceeds requirements established by the California Code of Regulations. 13. Design window systems to reduce thermal gain and loss, thus, reducing cooling loads during warm weather and heating loads during cool weather. 14. Install heat-reflective draperies on appropriate exposures.	

Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
	15. Install fluorescent and high-intensity-discharge (HID) lamps, which give the highest light output per watt of electricity consumed, wherever possible including all street and parking lot lighting to reduce electricity consumption. 16. Install occupant-controlled light switches and thermostats to permit individual adjustment of lighting, heating, and cooling to avoid unnecessary energy consumption. 17. Install time-controlled interior and exterior public area lighting limited to that necessary for safety and security. 18. Control mechanical systems (HVAC and lighting) in the building with timing systems to prevent accidental or inappropriate conditioning or lighting of unoccupied space. 19. Incorporate windowless walls or passive solar inset of windows into the project for appropriate exposures. 20. Design project to focus pedestrian activity within sheltered outdoor areas.	

Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
J.2 Natural Gas		
At buildout, the Harbor Gateway Center is estimated to consume 76.1 million cubic feet (mcf) of natural gas per year, a net increase of 62.8 mcf as compared to existing on-site conditions. The Southern California Gas Company's 6-inch main line in Normandie Avenue has sufficient capacity to accommodate on-site energy needs. Therefore, no significant impacts to natural gas service are anticipated.	1. The proposed project shall adhere to all applicable Southern California Gas Company (SCGC) rules and regulations. All necessary infrastructure improvements shall be constructed to meet the requirements of the SCGC. 2. The proposed project shall comply with and implement all energy conservation measures required by Title 24 of the California Administrative Code, and, whenever feasible, exceed them.	None.
J.3 Construction		None.
Project construction would consume an estimated 2.79 quadrillion BTUs of energy. It would not, however, use energy in a wasteful manner or adversely affect energy supplies.	None required.	

Cumulative Impact - Cumulative development would result in both short-term and long-term consumption of electricity, natural gas, and other energy resources. However, no significant cumulative impacts to energy resources or energy conveyance infrastructure would occur.

Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
	8. Selection of drought-tolerant, low water consuming plant varieties should be used to reduce irrigation water consumption. For a list of these plant varieties, refer to Sunset Magazine, October 1976, "Good Looking - Unthirsty," pp. 78-85, or consult a landscape architect. 9. Recirculating hot water systems can reduce water waste in long piping systems where water must be run for considerable periods before hot water is received at the outlet. 10. Lower-volume water closets and water-saving shower heads must be installed in new construction and when remodeling. 11. Plumbing fixtures should be selected which reduce potential water loss from leakage due to excessive wear of washers.	
K.3 Sewer At project buildout, on-site wastewater generation is estimated to be 244.6 million gallons per year, an increase of 239.1 million gallons per year over existing on-site conditions. This would incrementally add to the sewage generated by development in the project area and create additional impact to the existing wastewater treatment plant. On-site sewer system improvements proposed in conjunction with project buildout would enable the system to adequately handle wastewater flows from the site. Thus, project implementation is not expected to significantly impact sewer service.	1. Individual projects proposed as part of the Harbor Gateway Center shall apply for all required County Sanitation Districts of Los Angeles County (CSDLAC) permits, including Industrial Wastewater Discharge Permits. 2. All necessary infrastructure improvements shall be constructed to meet the requirements of the CSDLAC.	None.

Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
	3. The proposed project shall comply with all provisions of Ordinance No. 162,532, which reduces water consumption levels, thereby restricting wastewater flows. Water saving devices to be installed shall include low-flow toilets and plumbing fixtures that prevent water loss.	
K.4 Solid Waste		
Project construction activity would require the one-time hauling an disposal of demolition debris. Project operation would increase annual on-site solid waste generation by an estimated 22,000 tons per year, an amount that represents about 0.5 percent of the waste generated annually in the City of Los Angeles. Impacts are considered significant because of ongoing concerns about available landfill capacity in the Southern California region.	1. Trash compaction facilities shall be provided in all occupied structures, where deemed necessary and feasible. 2. To the extent feasible, one or more of the following yard waste management techniques shall be incorporated into the maintenance of the project: • Planting drought tolerant plants so as to minimize yard waste. • Mulching and grass recycling. • Composting of regular landscape maintenance waste where appropriate.	Although the recommended measures would reduce solid waste generation to the extent feasible, impacts to area landfills would remain significant.

Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
K. UTILITIES		
K.1 Communications		
By filed tariff, rule, or custom, it is the responsibility of the telephone service company to provide adequate service capacity; therefore, local service providers (Pacific Bell or others are expected to meet the needs of the proposed project. Continental Cablevision may provide broadband communications and video service to the site, although other companies have expressed interest in doing so. No significant impacts to either telephone or non-telephone communication services are anticipated.	1. The proposed project shall adhere to all applicable rules and regulations of the telecommunications service provider and the serving cable television company. All necessary infrastructure improvements shall be constructed to meet the requirements of Pacific Bell and the serving cable television company.	None.
K.2 Water		
Full occupancy of the proposed project would consume an estimated 269.4 million gallons of water per year, which represents an annual increase in on-site demand of 263.4 million gallons. Most of the project site would be served by the LADWP, although a portion of Area 2 would be served by the Dominguez Water Company (DWC). With infrastructure improvements proposed in conjunction with project buildout, the DWP and the DWC would be able to supply both domestic and fire water to the site. Therefore, impacts are considered less than significant.	1. The proposed project users and occupants shall adhere to all applicable Los Angeles Department of Water and Power (DWP) and Dominguez Water Company rules and regulations. All necessary infrastructure improvements shall be constructed to meet the requirements of the DWP and the Dominguez Water Company. 2. Proposed projects shall comply with all applicable sections of the City of Los Angeles Water Conservation Ordinance (Ordinance No. 166,080). Specifically, no hose washing of roadways, paved parking areas, and walkways shall be allowed.	None.

Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
	3. The proposed project shall comply with the City's Water Conservation Regulations defined in Ordinance No. 165,004, including installation of low-flow toilets and plumbing fixtures that prevent water loss. Also, plants selected for landscaping shall comply with xeriscape (low maintenance, drought-resistant) requirements. 4. Users shall be responsible for obtaining any required Industrial Wastewater Discharge permits required by Sanitation Districts of Los Angeles County (SDLAC). 5. The project shall comply with the provisions contained in City Landscape Ordinance No. 170,978, including water conservation measures for landscaping. The following Mitigation Measures Nos. 6 to 11 are recommended by the DWP to minimize on-site water consumption: 6. Automatic sprinklers should be set to irrigate landscaping during early morning hours or during the evening to reduce water losses from evaporation. However, care must be taken to reset sprinklers to water less often in cooler months and during the rainfall season so that water is not wasted by excessive landscape irrigation. 7. Reclaimed water should be investigated as a source to irrigate large landscaped areas.	

Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
	3. Prior to approval of demolition permits, the project sponsor shall be required to demonstrate how demolition debris will be salvaged and recycled in a manner that is practical, available, and assessable during the demolition phase. The project sponsor shall develop explicit language that clearly sets the requirements for a demolition debris recycling plan. The Integrated Solid Waste Management Office (ISWMO) will provide model specification language for project sponsor's use, which includes a format for developing a Solid Waste and Resources Action Plan.	
	4. Prior to approval of building permits, the project sponsor shall be required to demonstrate how construction debris will be recycled in a manner that is practical, available, and accessible during the construction phase. The project sponsor shall develop explicit language in the contractor proposal that clearly spells out the requirements for implementing a construction debris recycling plan. ISWMO shall provide model specification language for project sponsor's use, which includes a format for developing a Solid Waste and Resources Action Plan.	

Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
	5. Prior to approval of building permits, the project sponsor shall submit to the ISWMO a statement detailing the use of recycled materials in building materials, furnishing, operations, and maintenance of the project complex including grounds. The project developer shall maximize the employment of recycled content materials though construction and landscaping application that meet all approved local codes. ISWMO shall provide a summary format for the materials usage statement.	

Cumulative Impact - No significant cumulative impacts to communications, water, or sewer systems are anticipated. However, because of the limited capacity of area landfills, any project that generates additional solid waste is considered to contribute to a significant cumulative impact to regional landfill capacity.

Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
L. RISK OF UPSET Phase I environmental site assessments have been conducted for the entire project site. In addition, a Phase II assessment has been conducted for most of Area 1. The Phase I assessments identified several areas of interest throughout the site while the Phase II assessment identified four specific areas of concern in Area 1 (Buildings 29, 36, 37, and 44). Commencement of construction activity that results in soil disturbance prior to remediation of on-site soil contamination exceeding regulatory action levels would have the potential to pose health hazards. However, no such construction activity would occur without clearance from the appropriate regulatory agency. Therefore, no significant impacts are anticipated. Implementation of a Remediation Plan for the site would result in a long-term reduction in hazards related to soils and groundwater contamination.	1. Prior to issuance of grading permits, the applicant shall assess, as appropriate, the areas of continued environmental interest identified in the Subsurface Investigation prepared by Kennedy/Jenks Consultants for the area proposed for retail, restaurant, and theater uses (Parcel A in Appendix H of EIR No. 96-0060), and shall implement to the satisfaction of the appropriate regulatory agency any remediation plan that may be required as a result of the data generated by such assessment. 2. A Phase II subsurface investigation shall be conducted for the area proposed for office and industrial park uses (those portions of Parcels B and C in Appendix H of EIR No. 96-0060, for which areas of environmental interest were identified in the June 1996 Phase I Environmental Assessment). The applicant shall fully implement any recommendations for further assessment and/or remediation activity contained in the Phase II investigation, to the satisfaction of the appropriate regulatory agency. 3. No building permits shall be issued for construction of new structures on any portion of the project site in which soil contamination exceeding regulatory action levels exists until contamination on that portion of the project site affected by such activity is remediated to the satisfaction of the appropriate regulatory agency.	None.

Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
	4. Remediation of groundwater contamination having its source in the vicinity of Building 36 shall be undertaken by the applicant separately from the proposed project in coordination with the appropriate regulatory agency. However, on-site development shall be designed and sited so as not to interfere with future groundwater treatment. 5. All underground storage tanks on the project site shall be removed in conformance with State and City of Los Angeles Fire Department regulations.	
A total of 26 on-site buildings have been found to have asbestos containing materials (ACMs). Demolition of these structures without first removing friable ACMs would pose a potentially significant health hazard. However, all demolition activity would be conducted in full compliance with applicable regulations relating to ACMs, thereby reducing impacts to a less than significant level.	6. All contractors involved in demolition and/or renovation activity on the project site will fully comply with the requirements of SCAQMD Rule 1403, pertaining to the removal of ACMs.	None.

Cumulative Impact - Remediation of existing soil or groundwater contamination would generally be required prior to the development of any site. Therefore, cumulative development would reduce health hazards related to soil and groundwater contamination over the long term. Because all demolition activity in the area is subject to SCAQMD Rule 1403, no significant impacts related to the release of asbestos are anticipated.

Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
M. AESTHETICS		
Proposed development is consistent with applicable General Plan Framework policies regarding regional centers. The replacement of aging industrial facilities and vast parking lots with development to a smaller scale, and landscaped setbacks would also be consistent with the established trend in the area. This would be a beneficial aesthetic impact.	None required.	None.
Proposed Area 1 development includes two 120-foot tall pole-mounted signs. The height of the signs represents a substantial departure from City of Los Angeles sign regulations, which specify a maximum pole sign height of 42 feet. Otherwise, the signs would be compatible with project design standards. If approvals for the signs are granted, the signs would, by definition, be in conformance with sign regulations. Therefore, no significant impact is anticipated.	None required.	None.
Project structures and signs would be visible from various public and private vantages in the site vicinity and may partially block distant views. However, on-site development would not block any unique or valued views or scenic vistas. Impacts to views are therefore considered less than significant.	1. Building height shall not exceed 45 feet within 300 feet of the residential properties south of the project site. 2. A minimum 8-foot wall shall be constructed along the southern property line between the project site and adjacent residential properties on the north side of 203rd Street. Graffiti resistant paint shall be used on both sides of the wall. 3. Buildings shall be set back a minimum of 25 feet from the southern property line adjoining residential properties along 203rd Street.	None.

Table 1

SUMMARY CHART (continued)

Environmental Impact	Mitigation Measures	Unavoidable Significant Impacts
Cumulative Impact - The only related project sufficiently close to the project site to contribute to a cumulative visual impact upon the immediate area is the redevelopment of the former International Light Metals site. The shopping center and movie theater proposed for that site would be similar in nature to the proposed project. Cumulatively, the two projects would implement General Plan Framework policies promoting the development of attractive commercial corridors. The cumulative aesthetic impact of the two projects would therefore be beneficial.		

CITY OF LOS ANGELES
OFFICE OF THE CITY CLERK
ROOM 395, CITY HALL
LOS ANGELES, CALIFORNIA 90012

CALIFORNIA ENVIRONMENTAL QUALITY ACT

SUMMARY SHEET

(Article IV — City CEQA Guidelines)

POSSIBLE IMPACTS (Check where a Yes is appropriate)

A—Significant Adverse Impact; B—Mitigation Measures Available; C—Unavoidable Significant Adverse Impact	A	B	C
1. EARTH			
a. Change in topography or ground surface relief features?			
b. Increase in wind or water erosion?		X	
c. Unstable or hazardous geologic or oil conditions?		X	
2. AIR			
a. Increased mobile or stationary air emissions or air quality?	X	X	X
b. Creation of objectionable odors?			
3. WATER			
a. Change in absorption rates, drainage patterns, or surface runoff?	X	X	
b. Alteration to direction of any water course?			
c. Reduction in amount of water available for public water supplies?			
d. Exposure to flood hazards?			
4. PLANT LIFE			
a. Reduction of the numbers of any unique or endangered species of plants?			
b. Reduction of existing mature trees?		X	
c. Change in diversity of species?			
5. ANIMAL LIFE			
a. Reduction of the numbers of any unique or endangered species of animals?			
b. Introduction or increase of any new animals?			
c. Impact on any existing animal habitat?			
6. NOISE			
a. Increase in existing noise levels?	X	X	
b. Exposure of people to noise levels?	X	X	
7. LIGHT Will proposal produce light or glare?			
8. LAND USE Alteration of the present or planned land use of the area?			
9. NATURAL RESOURCES*			
a. Increase in consumption of any natural resource?			
b. Depletion of any non-renewable natural resource?			
10. POPULATION* Any increase or alteration of the distribution, density of growth rate of the population?			
11. HOUSING* Any increase in the demand for housing or reduction in existing housing?			
12. TRANSPORTATION/CIRCULATION			
a. Increase in traffic volume or change in circulation patterns?	X	X	X
b. Increase in parking demand (not met by on-site parking provided by the project)?			
c. Increased hazards to vehicles, bicyclists or pedestrians?			
d. Impact on existing transportation systems?	X	X	X
13. PUBLIC SERVICES			
a. Increase in demand for fire, police or other governmental services?	X	X	
b. Impact on school or recreational services?			
c. Increase in maintenance of public facilities including roads?			
14. ENERGY			
a. Use of additional amounts of fuel or energy?		X	
b. Increase in demand upon existing sources of energy or required development of new sources of energy?		X	
15. UTILITIES			
a. Demand on water, gas, power or communication systems?		X	
b. Impact on sewer or solid waste disposal?	X	X	X
c. Impact on storm water drainage?	X	X	
16. SAFETY			
a. Creation of any health hazard?		X	
b. Potential risk of explosion or release of chemicals or radiation in event of accident?			
17. AESTHETICS Will this project result in a diminishment or obstruction of a publicly available scenic vista, or in the creation of an offensive site visible to the public?		X	
18. CULTURAL RESOURCES* Will this project impact or alter any archaeological, paleontological or historical site, structure, or object?			
OTHER			

Form Gen. 149 2-81 Appendix B

APPENDIX B

*Determined not significant by the Initial Study.

EIR No. 96-0090-SUB(ZV)(CUB)(DA) SCH No. 96051050

Project Name: Harbor Gateway Center

RECOMMENDATION FOR EIR CERTIFICATION

Pursuant to California Code of Regulations, Title 14, Section 15090, this EIR has been completed in accordance with the California Environmental Quality Act and current State and City Guidelines, and, based on information now available, may be accepted and considered prior to making a final decision on the project. The decision making body must certify that it has reviewed and considered the information contained in this Environmental Impact Report prior to making such decision.

Submitted by:

Hadar Plafkin
Supervising City Planner
City Planning Department

Darryl L. Fisher
Associate Zoning Administrator
City Planning Department

II. CORRECTIONS AND ADDITIONS TO THE DRAFT EIR

This section includes changes to the Draft EIR which have resulted from the review of the Draft EIR by the Lead Agency, other public agencies and interested individuals and groups. Revisions are presented in the order that the information was presented within the Harbor Gateway Center Draft EIR.

1. PROJECT DESCRIPTION

a. A. Statement of Project Objectives, page 53, first paragraph, second sentence, change "45 lots" to "approximately 44 lots".

b. C. Project Background, page 59, third paragraph, add the following footnote after the first sentence:

"[1] The Applicant has initiated demolition of approximately 625,000 square feet of existing buildings in anticipation of the proposed project."

c. D. Project Characteristics, page 64, first paragraph, change the first sentence to read:

"The proposed project involves approval of a subdivision (Vesting Tentative Tract No. 52172) and implementation of a redevelopment and reuse program for the project site involving demolition of an estimated 2.4 million square feet of existing industrial/ warehouse buildings and construction of slightly less than three million square feet of retail and office/industrial park uses over a ten year period."

d. D. Project Characteristics, page 64, first paragraph, add the following footnote after the second sentence:

"[2] In anticipation of the proposed project, the Applicant has initiated demolition of approximately 625,000 square feet of existing buildings. However, even taking into account this initial demolition phase, this net change in development on the project site would remain unchanged."

e. D. Project Characteristics, page 64, first paragraph, fourth sentence, change "40 developable acres" to "approximately 42 developable acres".

f. D. Project Characteristics, page 64, first paragraph, fifth sentence, change "115.6 developable acres" to "approximately 116 developable acres".

g. D. Project Characteristics, page 64, first paragraph, sixth sentence, change "remaining 14.6 acres" to "remaining approximately 12.6 acres".

h. D. Project Characteristics, page 64, third paragraph, first sentence, change "a 40-acre area" to "an approximately 42-acre area".

i. D. Project Characteristics, page 64, add the following footnote after the second sentence:

"[3] The Applicant initiated demolition of these structures, with the approval of the Department of Building and Safety."

j. D. Project Characteristics, page 65, revise Figure 6 as shown on page 57.

k. D. Project Characteristics, page 66, Table 2, change footnote **a** to read:

"Represents an approximately 0.25:1 FAR."

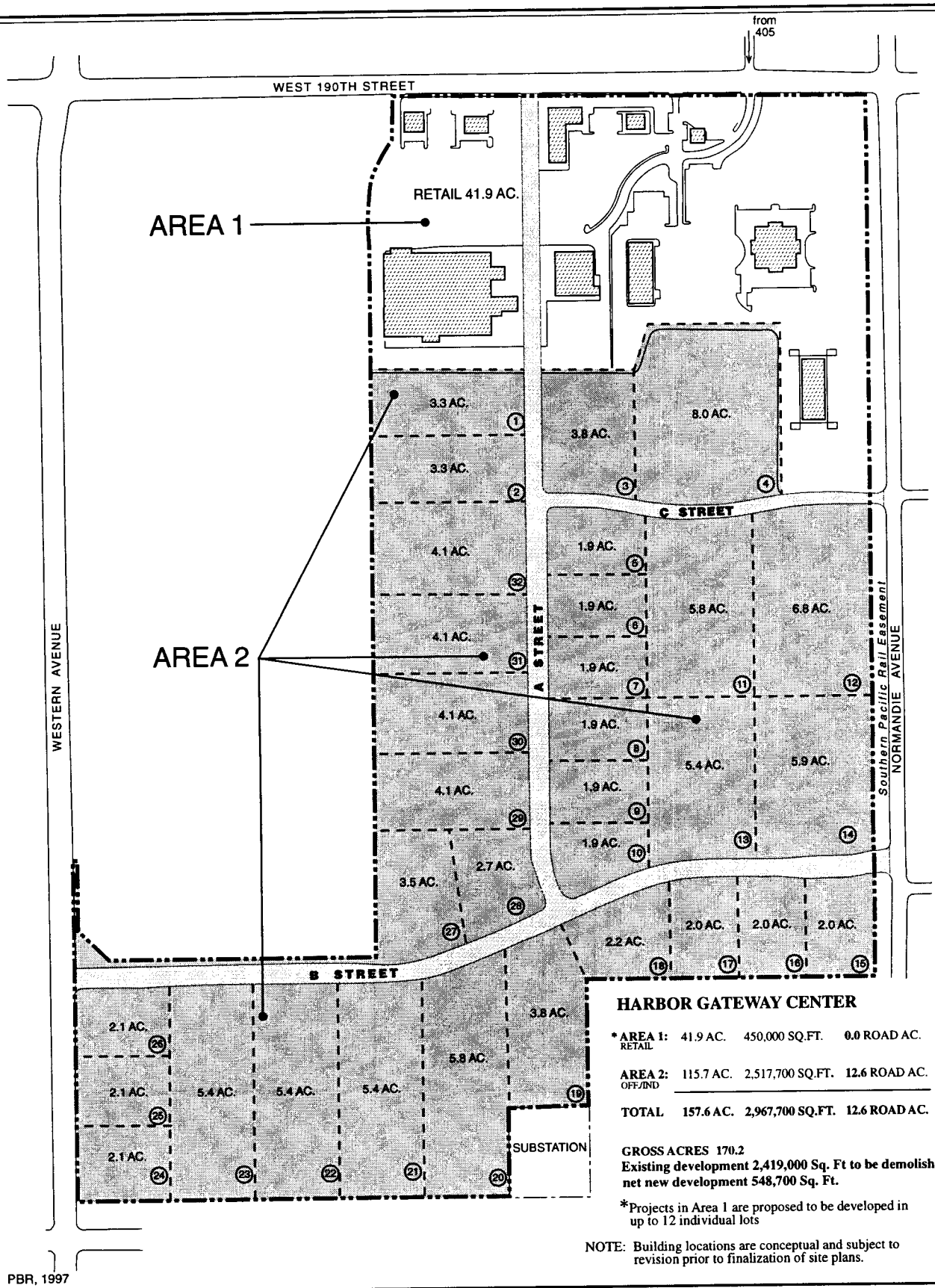
l. D. Project Characteristics, page 66, first paragraph, fourth sentence, change "0.26:1" to "0.25:1".

m D. Project Characteristics, page 67, revise Figure 7 as shown on page 58.

n. D. Project Characteristics, page 69, revise Figure 8 as shown on page 59.

o. D. Project Characteristics, page 71, change the second paragraph under **a. Vehicular Circulation**, to read:

"A north-south ingress-egress roadway would be added in the west central part of Area 1, aligned to the current intersection of 190th and Denker Streets. The northernmost segment of this roadway would be added in conjunction with the buildout of Area 1 and would serve as the main entrance for the Area 1 retail development (see Figure 10 on



HARBOR GATEWAY CENTER

*AREA 1: RETAIL	41.9 AC.	450,000 SQ.FT.	0.0 ROAD AC.
AREA 2: OFF-/IND	115.7 AC.	2,517,700 SQ.FT.	12.6 ROAD AC.
TOTAL	157.6 AC.	2,967,700 SQ.FT.	12.6 ROAD AC.

GROSS ACRES 170.2

Existing development 2,419,000 Sq. Ft to be demolished
net new development 548,700 Sq. Ft.

*Projects in Area 1 are proposed to be developed in up to 12 individual lots

NOTE: Building locations are conceptual and subject to revision prior to finalization of site plans.

Source: PBR, 1997

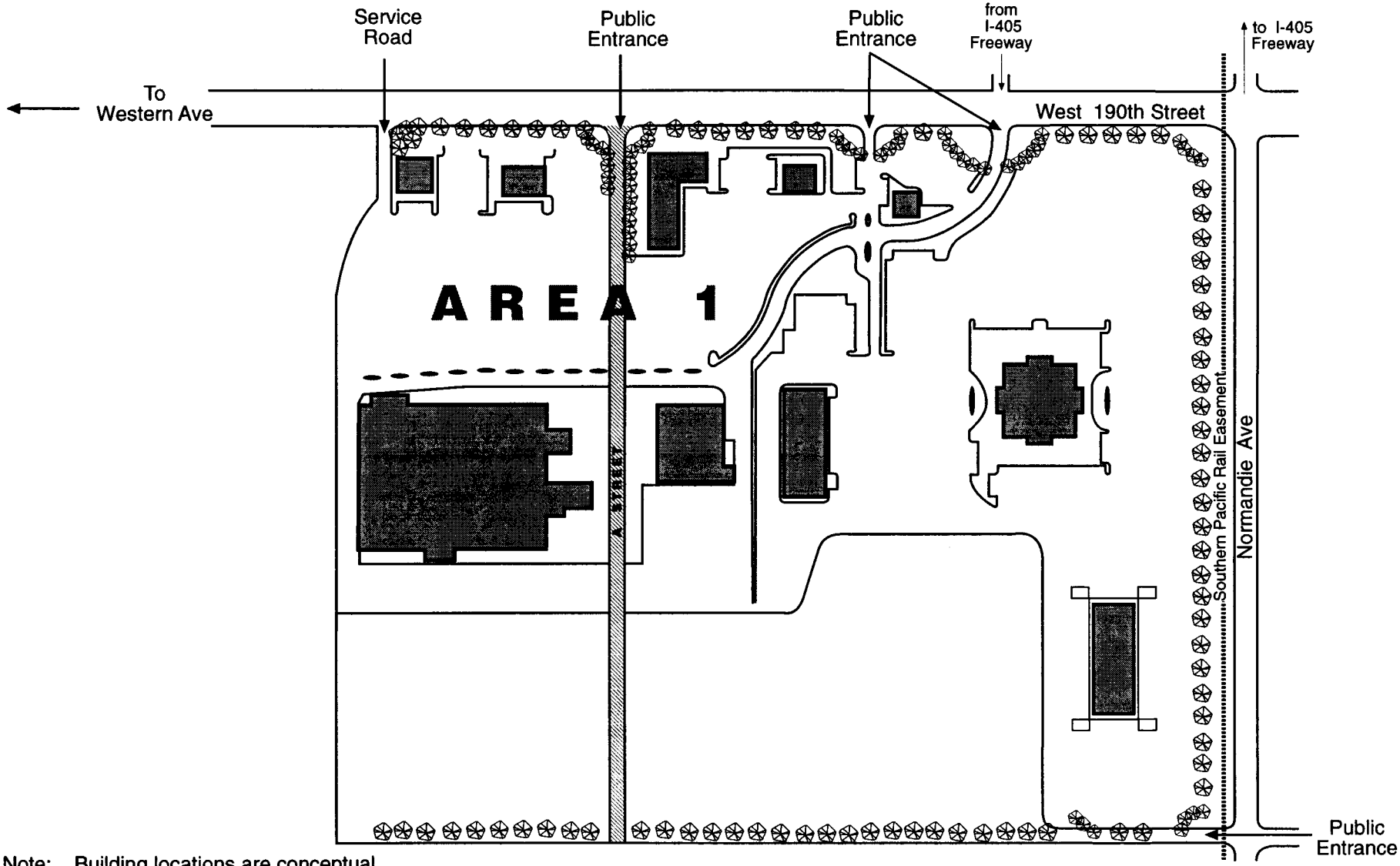
Planning Consultants Research

Project Site Boundary
① Parcel Number
1.0 AC. Parcel Acreage

N

0 400 800 Feet

Figure 6
Concept Plan

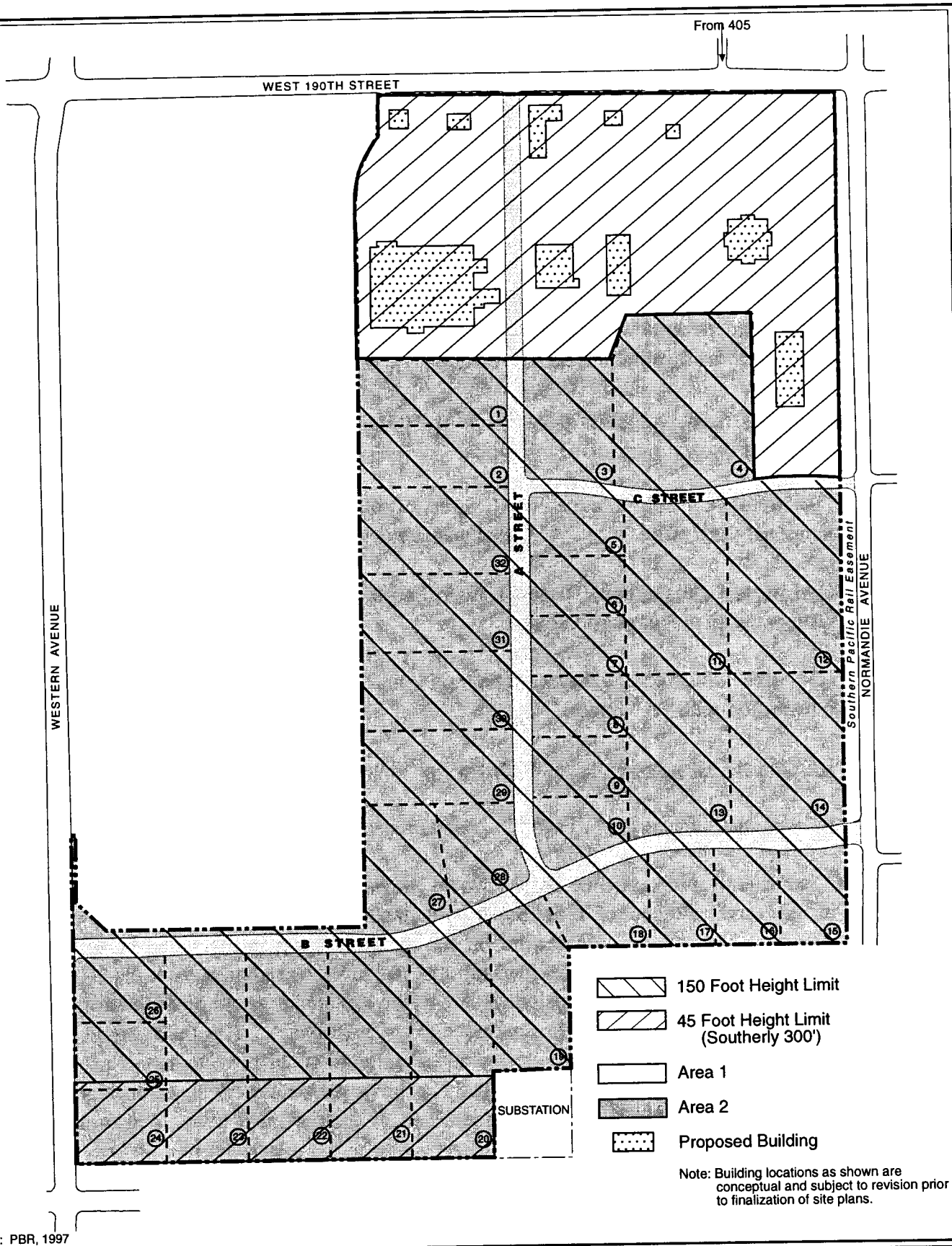


Note: Building locations are conceptual and subject to revision prior to finalization of the site plan.

Planning Consultants Research

N

Figure 7
Conceptual Area 1 Site Plan



Source: PBR, 1997

Planning Consultants Research

Project Site Boundary
① Parcel Number
Parcel Acreage

N

0 400 800 Feet

Figure 8
Project Height Districts

page 72). This roadway would also provide future access to Area 2. This roadway would be served by the existing traffic signal located at 190th and Denker Streets."

p. D. Project Characteristics, page 71, change the first sentence of the third paragraph under **a. Vehicular Circulation**, to read:

"As noted above, the proposed ingress-egress roadway would provide access to Area 2, up to its intersection with proposed "C" Street, an east-west street which would provide access to Area 2 from Normandie Avenue via a new rail crossing, as discussed below."

q. D. Project Characteristics, page 71, third paragraph under **a. Vehicular Circulation**, add the following:

"South of "C" Street, a new "A" Street would be constructed to serve proposed industrial park/office lots. "A" Street would extend south to intersect with "B" Street."

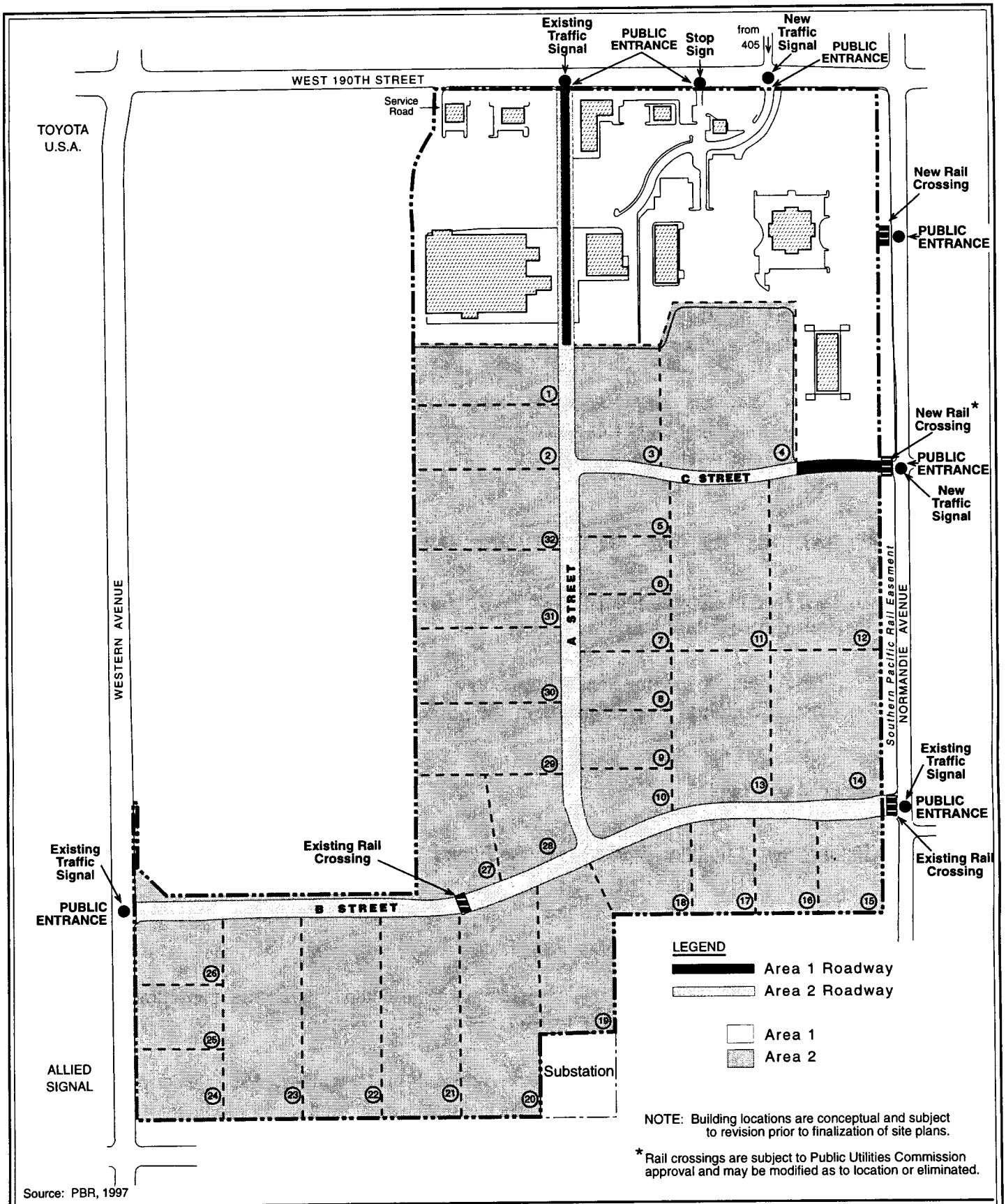
r. D. Project Characteristics, page 71, fourth sentence under **a. Vehicular Circulation**, change the first sentence to read:

"C" Street would extend westward from Normandie Avenue and would terminate at its intersection with "A" Street."

s. D. Project Characteristics, page 72, revised Figure 10 as shown on page 61.

t. D. Project Characteristics, page 73, change the first full paragraph to read:

"As currently proposed, the project would provide six public entrances. These would include three entrances on 190th Street, two on Normandie Avenue, and one on Western Avenue. Two of the proposed public entrances on 190th Street would be driveways providing access to the Area 1 parking lot, including one aligned with the I-405 off-ramp, which is proposed to include a new traffic signal and would provide direct access to the retail center for traffic exiting the I-405 freeway. The third would be the proposed north-south ingress-egress roadway, which would provide access to Area 2, as well as serving the retail area. The two proposed public entrances on Normandie Avenue would include: (1) the proposed new "C" Street, which would also include a new rail crossing and would provide direct access to the eastern portion of Area 1 when the retail component of the project is built and would be extended to provide direct access to Area 2 when the industrial/office park component of the project is built; and



Planning Consultants Research

Figure 10
Internal Circulation System

(2) "B" Street, which has an existing rail crossing. The proposed new Normandie Avenue rail crossing at the existing Southern Pacific rail line are subject to the approval of the California Public Utilities Commission. Depending upon the outcome of this process, internal roadways would be subject to realignment in order to support adequate internal circulation within the project site. The Western Avenue public entrance would also be on "B" Street, which provides access to Area 2."

u. D. Project Characteristics, page 74, first paragraph under **a. Site Planning/ Architecture**, change the third sentence to read:

"Site organization is envisioned to be functional by locating sufficient parking in close proximity to building entrances and direct convenient access provided from 190th Street and Normandie Avenue."

2. GENERAL DESCRIPTION OF ENVIRONMENTAL SETTING

a. A. Overview of Project Setting, page 79, first paragraph, add the following footnote at the end of the sixth sentence:

"[3] The Applicant has initiated demolition of approximately 625,000 square feet of existing buildings in anticipation of the proposed project."

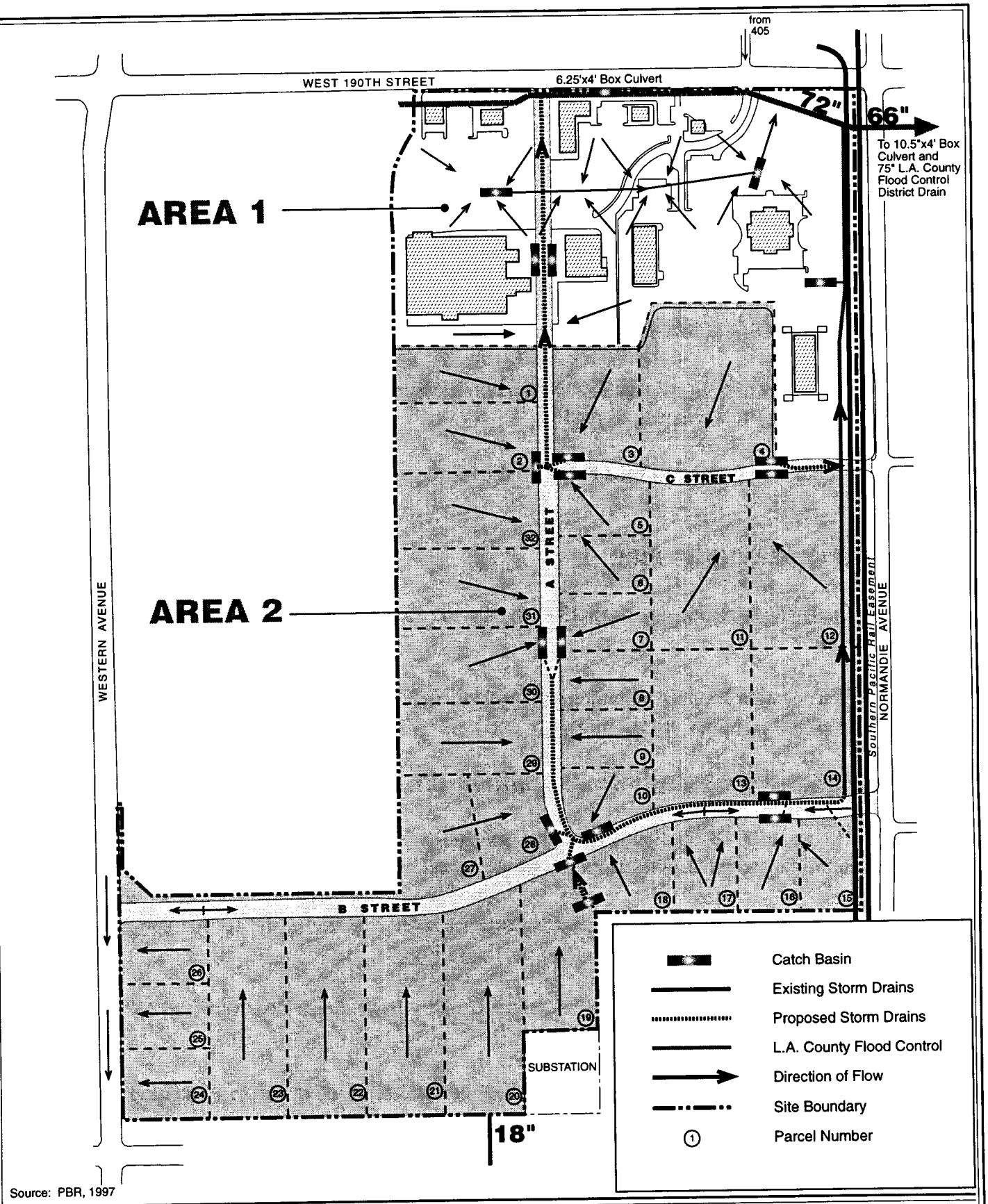
3. SURFACE WATER

a. Environmental Setting, page 126, revise Figure 14 as shown on page 63.

4. LAND USE

a. Environmental Setting, page 187, change the fourth sentence of the first paragraph under **b. Relevant Land Use Policies** to read:

"The City's General Plan Framework, adopted in December, 1996, also provides additional guidance on land use issues against which on-site development must be considered."



Source: PBR, 1997

Planning Consultants Research

N

0 200 400 Feet

Figure 14
Existing and Proposed Storm Drains

b. Environmental Setting, page 193, change the first sentence of the first paragraph under **(3) General Plan Framework** to read:

"The City of Los Angeles General Plan Framework, adopted in December, 1996, provides current general guidance on land use issues for the entire City."

5. TRANSPORTATION/CIRCULATION

a. Mitigation Measures, page 232, Mitigation Measure 1 under **a. TDM Programs**, change the second full sentence to read:

"It shall be followed in the design and construction of the project site and buildings."

6. PUBLIC SERVICES - FIRE

a. Environmental Setting, page 239, change the first sentence of the third paragraph to read:

"Fire Station Number 64 is situated approximately 6.4 miles from the project site, at 118 West 108th Street in Los Angeles."

b. Environmental Setting, page 241, change the first sentence of the first paragraph to read:

"Located at 18030 South Vermont Avenue in Los Angeles, Station Number 79 is approximately 1.2 miles from the project site."

c. Environmental Setting, page 241, change the first sentence of the second paragraph to read:

"Station 85 is located approximately 5.0 miles from the project site,[1] at 1331 West 253rd Street in Harbor City."

d. Environmental Setting, page 241, delete the third sentence of the second paragraph.

---

[1] *Distance computed to West Knox Street and South Normandie Avenue.*

e. Environmental Setting, page 241, insert the following paragraphs between the second and third paragraphs:

"Fire Station Number 38 is situated approximately 4.2 miles from the project site, at 124 East "I" Street in Wilmington. This Task Force Station is equipped with an engine company, a truck company, a paramedic rescue ambulance and a staff of 12 LAFD personnel. Due to its proximity to the project site, this facility is the designated first-in truck company.

Station 49 is located at 400 Yacht Street, Berth 194 in Wilmington, approximately 7.3 miles from the project site. Furnished with a single engine company, boats 3 and 4, and a staff of 13 LAFD personnel, this station serves as Battalion 6 Headquarters."

f. Environmental Setting, page 241, delete the second sentence of the third paragraph.

g. Environmental Setting, page 241, change the third sentence of the third paragraph to read:

"Based upon the fire flow requirement set by the LAFD, the Fire Code indicates a maximum response distance of 1.0 miles to the nearest engine company and 1.5 miles to the nearest truck company."

h. Environmental Setting, page 242, insert the following sentence in the second line of the page such that it reads as the first complete sentence on the page:

"The LAFD has set the fire flow requirement for the Harbor Gateway Center at 9,000 GPM, flowing from six fire hydrants simultaneously."

i. Project Impacts, page 243, change the last sentence of the third paragraph in this section to read:

"This increase in population would increase on-site demand for fire protection and emergency medical service."

j. Project Impacts, page 243, change the first sentence of the last paragraph which begins on this page to read:

"The Harbor Gateway Center is located 1.2 miles from the nearest engine company (Station 79) and 4.2 miles from the nearest truck company (Station 38)."

k. Mitigation Measures, page 246, change the first sentence of Mitigation Measure 10 to read:

"Where a cul-de-sac near a given development requires accommodation of a Fire Department apparatus, the minimum outside radius of the paved surface shall be 35 feet."

l. Mitigation Measures, page 247, insert the following mitigation measures:

17. At least two different ingress/egress roads for each area, that will accommodate a major fire apparatus and provide for major evacuation during emergency situations, shall be required.

18. Construction of any public or private roadway in the proposed development shall not exceed 15 percent in grade.

19. Where access for a given development requires accommodation of a Fire Department apparatus, overhead clearance shall not be less than 14 feet.

20. Access for LAFD apparatus and personnel to and into all structures shall be required.

21. Additional vehicular access may be required by the LAFD where buildings exceed 28 feet in height.

22. Where a fire apparatus will be driven onto the road level surface of the subterranean parking structure, that structure shall be engineered to withstand a bearing pressure of 8,600 pounds per square foot.

23. The design, location, and operation of gates, if any are utilized within the industrial/office component of the project, shall be to the satisfaction of the LAFD and the Deputy Advisory Agency. Warning signs and lighting shall be installed and maintained satisfactory to the LAFD and the Department of Transportation. The names and phone numbers of the current officers of the property owners association (see Mitigation Measure 24) shall be submitted to

the Fire Department, Police Department, and the Deputy Advisory Agency. All necessary permits shall be secured from the Department of Building and Safety and from other City agencies.

24. In order to provide assurance that the proposed common fire lanes and fire protection facilities for the project which are not maintained by the City are properly and adequately maintained, the subdivider shall record with the County Recorder, prior to the recordation of the final map, a covenant and agreement (Planning Department General Form CP-6770) to assure the following:

- The establishment of a property owners' association which shall cause a yearly inspection to be made by a registered civil engineer of all common fire lanes and fire protection facilities. Any necessary maintenance and corrective measures will be undertaken by the association. Each future property owner shall automatically become a member of the association or organization required above and is automatically subject to a proportionate share of the cost.

- The future owners of affected lots with common fire lanes and fire protection facilities shall be informed of their responsibility for the maintenance of the devices on their lots. The future owner and all successors will be presented with a copy of the maintenance program for their lot. Any amendment or modification that would defeat the obligation of said association as required hereinabove must be approved in writing by the Advisory Agency after consultation with the Fire Department.

- In the event that the property owners' association fails to maintain the common property and easements as required by the CC and R's, the individual property owners shall be responsible for their proportional share of the maintenance.

- Prior to any building permits being issued, the applicant shall improve, to the satisfaction of the Fire Department, all common fire lanes and install all private fire hydrants to be required.

- The common fire lanes and fire protection facilities shall be shown on the final map.

Plot plans showing fire hydrants and access for each phase of the project must be approved by the LAFD prior to the recording of the final map for that phase. Each phase shall comply independently with code requirements.

7. UTILITIES - WATER

a. Environmental Setting, page 271, revise Figure 30 as shown on page 69.

b. Project Impacts, page 272, change the fourth sentence of the second full paragraph to read:

New water lines would connect to both the 8 to 12-inch DWP line in 190th Street and the existing 16-inch line located on-site which ties to the 31-inch DWP line in Normandie Avenue.

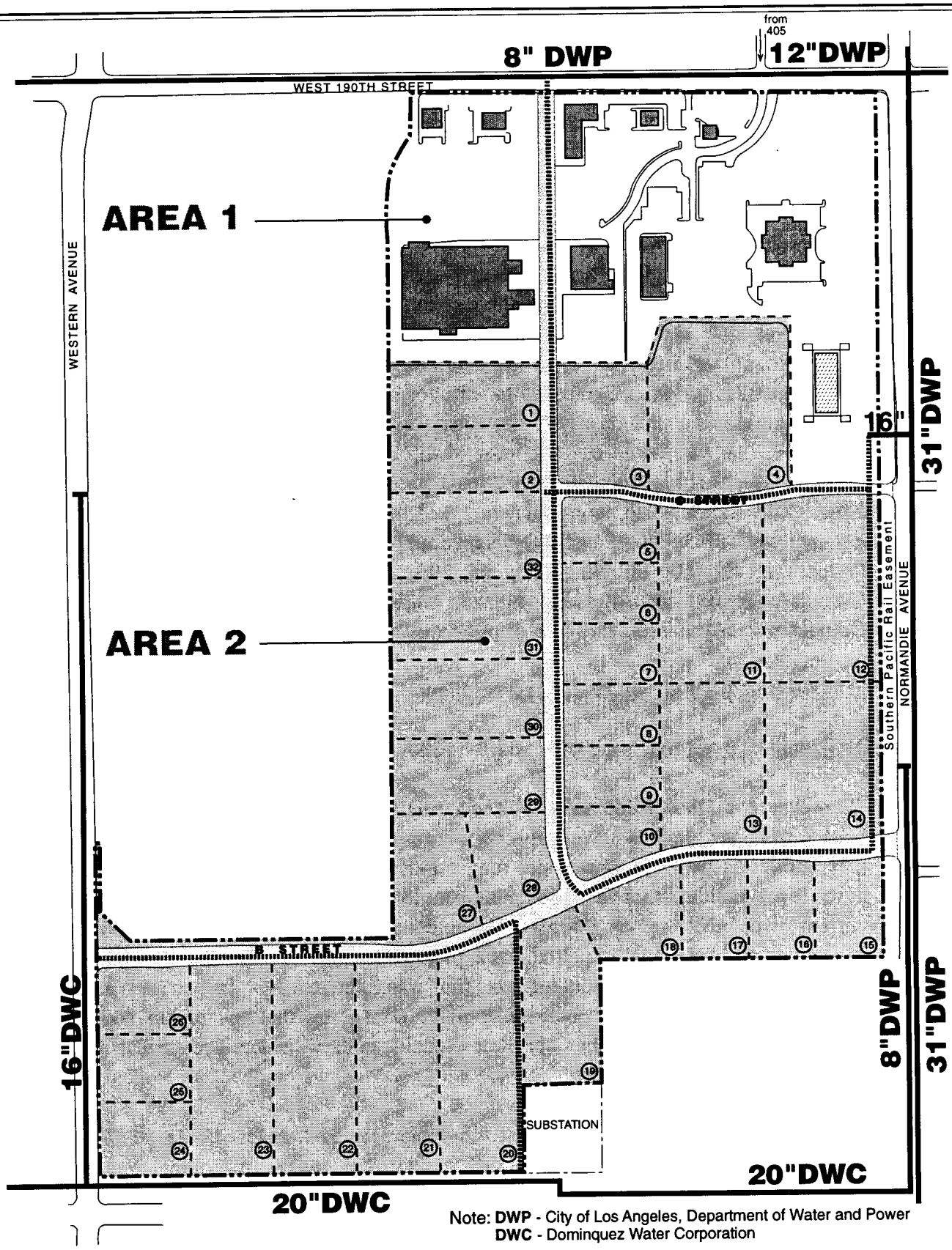
c. Project Impacts, page 272, insert the following sentence between the fifth and sixth sentences of the second full paragraph:

Because the two main water mains in 190th Street and Normandie Avenue to which the new system will connect are in different pressure systems, pressure regulation will be necessary to serve the site.

8. UTILITIES - SEWER

a. Environmental Setting, page 277, change the first paragraph to read:

"Wastewater generated at the McDonnell Douglas property is treated by the County Sanitation Districts of Los Angeles County (CSDLAC). The main sewer lines that serve the project site vicinity include the District No. 5 Interceptor Trunk Sewer, which ranges in diameter from 63 to 66 inches, and an adjacent 57 inch line, both located in a 15-foot wide easement in Normandie Avenue. Please refer to Figure 31 on page 278, for an illustration of existing (and proposed) local sewer lines. The CDSLAC plans to close either the District No. 5 Interceptor Trunk Sewer or the 57-inch line in 1998. New connections are allowed and existing connections can be used by new developments. Plans for existing connections have not yet been determined. In addition, CSDLAC is not permitting any new connections to a 90-inch line in Western Avenue."



Note: **DWP** - City of Los Angeles, Department of Water and Power
DWC - Dominquez Water Corporation

Source: Tait & Associates, Inc.

Planning Consultants Research

N

0 200 400 Feet

Existing Water Lines
Proposed Water Lines
Project Site Boundary
① Parcel Number

Figure 30
Existing and Proposed Water System

b. Environmental Setting, page 277-279, change the third paragraph starting on page 277 to read:

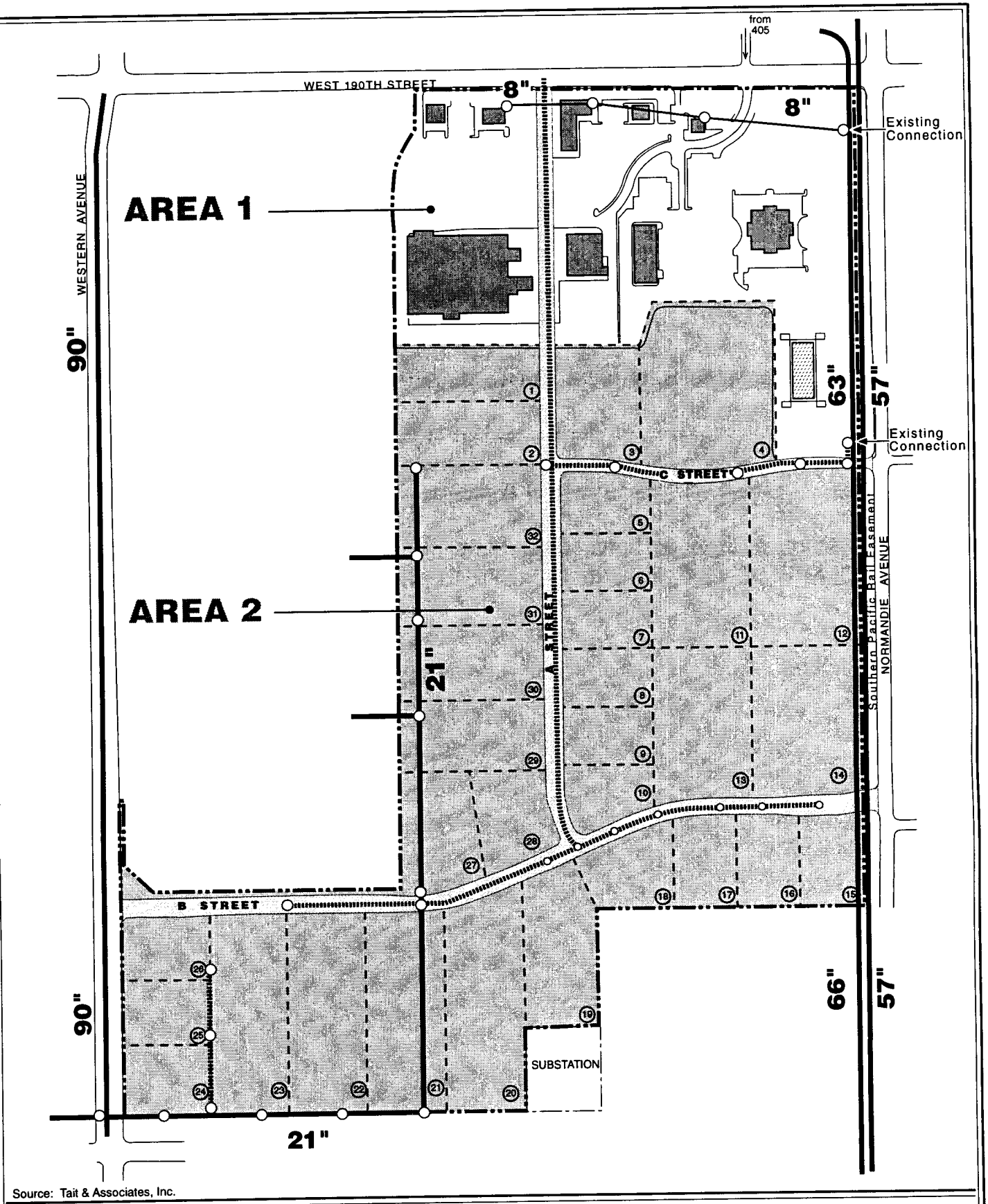
"Discharge of wastewater to the conveyance and treatment system operated by the CSDLAC is regulated by a permitting system operated by the CSDLAC. Sewer discharge at the McDonnell Douglas site was entitled by Industrial Wastewater Discharge Permit Nos. 799 and 800, issued in 1975 and 1976, respectively, by the CSDLAC. Permit No. 800 was reapproved in 1981. These permits were voided on May 15, 1996 and August 21, 1996, respectively, based upon an inspection conducted by CSDLAC which determined that industrial wastewater was no longer being discharged from the site. These permits authorized a combined discharge of 1896.44 sewer capacity units per day, which included the site's industrial flow rate of 660,285 gpd, as redefined in 1991. This translated to approximately 172.0 million gallons annually, based upon 5 days per week discharge. Sewage flows recorded in 1993 and 1994, however, decreased to approximately 100 million gallons and 30 million gallons per year, respectively.[84] Current combined industrial and sanitary wastewater generation at the McDonnell Douglas property is estimated at 6.6 million gallons per year.[85]"

c. Environmental Setting, page 278, revise Figure 31 as shown on page 71.

d. Environmental Setting, page 279, add the following after the first (partial) paragraph:

"However, even though Industrial Wastewater Discharge Permits Nos. 799 and 800 have been voided, the 1896.44 sewer capacity units remain attached to the project site, where they entitle discharge of wastewater (either industrial or sanitary) to the sewer system at the levels indicated above. The entitlement to discharge may be transferred from the current owner (McDonnell Douglas) to another property owner within the project site if some or all of the McDonnell Douglas property is sold. If a new use on the project site has a requirement to discharge industrial wastewater, a new Industrial Wastewater Discharge Permit must be obtained from CSDLAC by that owner, in addition to acquiring the requisite number of sewer capacity units to accommodate that project's discharge to the sewer system."

e. Environmental Setting, page 279, first full paragraph, first sentence, change "SDLAC" to "CSDLAC".



Source: Tait & Associates, Inc.

Planning Consultants Research

○ Manhole
① Parcel Number
Existing Water Lines
Proposed Water Lines
Project Site Boundary

N

0 200 400 Feet

Figure 31
Existing and Proposed Sewer System

f. Project Impacts, page 279, third full paragraph, first sentence, change "SDLAC" to "CSDLAC".

g. Project Impacts, page 279, fourth full paragraph, fourth sentence, change "SDLAC" to "CSDLAC".

h. Project Impacts, page 280, first (partial) paragraph, first full sentence, change "SDLAC" to "CSDLAC".

i. Mitigation Measures, page 281, change Mitigation Measure 1 to read:

"1. Individual projects proposed as part of Harbor Gateway Center shall apply for all required County Sanitation Districts of Los Angeles County (CSDLAC) permits, including Industrial Wastewater Discharge permits."

j. Mitigation Measures, page 281, Mitigation Measure 2, change "SDLAC" to "CSDLAC".

9. UTILITIES - SOLID WASTE

a. Environmental Setting, page 284, change Table 36 to read:

Table 36

EXISTING LANDFILLS AVAILABLE TO NON-RESIDENTIAL FACILITIES IN THE CITY OF LOS ANGELES
(millions of tons)

Site	Location	Annual Capacity[a]	Annual Disposal[b]	Remaining Capacity	Permit Exp. Date
Azusa Land Reclamation	Azusa	--	--	--	[c]
BKK	West Covina	--	--	--	[c]
Bradley West[d]	Sun Valley	2.19	1.40	7.51	2007
Chiquita Canyon	Val Verde	1.83	0.46	1.85	1997

[a] *Annual capacity as of January 1996.*

[b] *Annual disposal of municipal solid waste in 1995.*

[c] *Closed per legal settlement.*

[d] *Landfill site presently being used by Western Waste, which serves the project site.*

Source: Los Angeles County Department of Public Works, Environmental Programs Division, Preliminary Draft Los Angeles County Countywide Siting Element, January 1996.

10. ALTERNATIVES

a. No Project Alternative, page 344, first paragraph under **1. DESCRIPTION OF THE ALTERNATIVE**, change the second sentence to read:

"Approximately 1.8 million square feet of existing industrial and warehouse buildings would remain, which accounts for demolition of approximately 625,000 square feet of existing buildings which the Applicant has undertaken in anticipation of the remainder of the proposed project."

b. No Project Alternative, page 354, first paragraph under **Transportation/ Circulation**, change the second sentence to read:

"Approximately 8,560 daily vehicle trips are expected to occur in the absence of the proposed project, as compared to 29,900 daily trips that would be generated by the proposed project."

11. APPENDIX A: MITIGATION MONITORING AND REPORTING PROGRAM

a. Transportation/Circulation, Appendix A, page A-19, Mitigation Measure 1, change the second full sentence to read:

"It shall be followed in the design and construction of the project site and buildings."

b. Public Services - Fire Protection, Appendix A, page A-30, change the first sentence of Mitigation Measure 10 to read:

Where a cul-de-sac near a given development requires accommodation of a Fire Department apparatus, the minimum outside radius of the paved surface shall be 35 feet.

c. Public Services - Fire Protection, Appendix A, page A-31, insert the following mitigation measures:

17. At least two different ingress/egress roads for each area, that will accommodate a major fire apparatus and provide for major evacuation during emergency situations, shall be required.

Monitoring Phase:	Pre-Construction
Enforcement Agency:	City Fire Department
Monitoring Agency:	City Fire Department

18. Construction of any public or private roadway in the proposed development shall not exceed 15 percent in grade.

Monitoring Phase: Pre-Construction
Enforcement Agency: City Fire Department
Monitoring Agency: City Fire Department

19. Where access for a given development requires accommodation of a Fire Department apparatus, overhead clearance shall not be less than 14 feet.

Monitoring Phase: Pre-Construction
Enforcement Agency: City Fire Department
Monitoring Agency: City Fire Department

20. Access for LAFD apparatus and personnel to and into all structures shall be required.

Monitoring Phase: Pre-Construction, Construction, Occupancy
Enforcement Agency: City Fire Department
Monitoring Agency: City Fire Department

21. Additional vehicular access may be required by the LAFD where buildings exceed 28 feet in height.

Monitoring Phase: Pre-Construction, Construction, Occupancy
Enforcement Agency: City Fire Department
Monitoring Agency: City Fire Department

22. Where a fire apparatus will be driven onto the road level surface of the subterranean parking structure, that structure shall be engineered to withstand a bearing pressure of 8,600 pounds per square foot.

Monitoring Phase: Pre-Construction
Enforcement Agency: City Fire Department
Monitoring Agency: City Fire Department

23. The design, location, and operation of gates, if any are utilized within the industrial/office component of the project, shall be to the satisfaction of the

LAFD and the Deputy Advisory Agency. Warning signs and lighting shall be installed and maintained satisfactory to the LAFD and the Department of Transportation. The names and phone numbers of the current officers of the property owners association (see Mitigation Measure 24) shall be submitted to the Fire Department, Police Department, and the Deputy Advisory Agency. All necessary permits shall be secured from the Department of Building and Safety and from other City agencies.

Monitoring Phase: Pre-Construction, Construction, Occupancy
Enforcement Agency: City Fire Department
Monitoring Agency: City Fire Department

24. In order to provide assurance that the proposed common fire lanes and fire protection facilities for the project which are not maintained by the City are properly and adequately maintained, the subdivider shall record with the County Recorder, prior to the recordation of the final map, a covenant and agreement (Planning Department General Form CP-6770) to assure the following:

- The establishment of a property owners' association which shall cause a yearly inspection to be made by a registered civil engineer of all common fire lanes and fire protection facilities. Any necessary maintenance and corrective measures will be undertaken by the association. Each future property owner shall automatically become a member of the association or organization required above and is automatically subject to a proportionate share of the cost.
- The future owners of affected lots with common fire lanes and fire protection facilities shall be informed of their responsibility for the maintenance of the devices on their lots. The future owner and all successors will be presented with a copy of the maintenance program for their lot. Any amendment or modification that would defeat the obligation of said association as required hereinabove must be approved in writing by the Advisory Agency after consultation with the Fire Department.
- In the event that the property owners' association fails to maintain the common property and easements as required by the CC and R's, the individual property owners shall be responsible for their proportional share of the maintenance.
- Prior to any building permits being issued, the applicant shall improve, to the satisfaction of the Fire Department, all common fire lanes and install all private fire hydrants to be required.

- The common fire lanes and fire protection facilities shall be shown on the final map.

Plot plans showing fire hydrants and access for each phase of the project must be approved by the LAFD prior to the recording of the final map for that phase. Each phase shall comply independently with code requirements.

Monitoring Phase:	Pre-Construction
Enforcement Agency:	City Fire Department
Monitoring Agency:	City Fire Department

d. Utilities - Sewer, Appendix A, page A-41, change Mitigation Measure 1 to read:

"1. Individual projects proposed as part of Harbor Gateway Center shall apply for all required County Sanitation Districts of Los Angeles County (CSDLAC) permits, including Industrial Wastewater Discharge permits."

e. Utilities - Sewer, Appendix A, page A-41, Mitigation Measure 2, change "SDLAC" to "CSDLAC".

12. APPENDIX F: TRAFFIC ANALYSIS

a. Page 21, Table 4, change the 10th line to read:

"Daily: $T = 4.949(A) + 765.587$

b. Page 21, Table 4, change the 14th line to read:

"Daily: $Ln(T) = 0.835Ln(A) + 3.435$

c. Page 42, change the second and third sentences of the second paragraph to read:

"The project will add incrementally to these significant cumulative impacts. The project will have significant impacts at up to three locations in the morning peak hour and in the opposite direction at two of these locations in the evening peak hour."

d. Page 46, first paragraph under "Category 1 - TDM Programs", change the second full sentence to read:

"It shall be followed in the design and construction of the project site and buildings."

III. RESPONSE TO COMMENTS

The Draft EIR for the Harbor Gateway Center project was distributed for public review between February 6, 1997 and March 24, 1997. During the public review period, a total of 16 comment letters pertaining to the Draft EIR were received by the City of Los Angeles Department of City Planning. Each comment raised in these letters is responded to in this section of the Final EIR. The letters received during the public review period included the following:

State of California

1. Antero A. Rivasplata, Chief, State Clearinghouse - March 21, 1997

2. Stephen J. Buswell, IGR/CEQA Coordinator, Department of Transportation, Transportation Planning Office - March 3, 1997

Regional

3. Viviane Doche-Boulos, Intergovernmental Review, Southern California Association of Governments - February 27, 1997

County

4. Marie L. Pagenkopp, Engineering Technician, Planning & Property Management Section, County Sanitation Districts of Los Angeles County - March 13, 1997

5. G. William Lundgren, Congestion Management Program, Los Angeles County Metropolitan Transportation Authority - March 12, 1997

City of Los Angeles

6. Thomas E. McMaster, Assistant Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department - March 13, 1997

7. Robert B. Hansohn, Captain, Area Commanding Officer, Harbor Community Police Station, Los Angeles Police Department - March 19, 1997

8. Joan Friedman, Environmental Review Unit, Los Angeles Unified School District - March 24, 1997

9. Jodean M. Giese, Supervisor of Environmental Assessment Business Team, Department of Water and Power of the City of Los Angeles - March 20, 1997

10. Robert Takasaki, Senior Transportation Engineer, Department of Transportation - January 16, 1997

11. Jack Sedwick, Principal City Planner, Community Planning Bureau, Los Angeles City Planning Department - March 10, 1997

12. Glenn Hirano, Assistant Division Engineer, Development Services Division (Land Development), Bureau of Engineering - March 21, 1997

Other Cities

13. Barbara Kilroy, Senior Planner, City of Compton - February 26, 1997

14. Kathy T. Ikari, Community Development Director, City of Gardena - March 18, 1997

Private Individuals

15. Dale Neal, Latham & Watkins (representing the Project Applicant) - March 24, 1997

16. Jerold B. Neuman, Allen, Matkins, Leck, Gamble & Mallory - March 21, 1997

A summary of the environmental issues addressed in each of these comment letters is provided in the following matrix.

Draft Environmental Impact Report

Harbor Gateway Center

SUMMARY OF COMMENTS ON DRAFT EIR

	II. PROJECT DESCRIPTION	III. ENVIRONMENTAL SETTING	IV. ENVIRONMENTAL IMPACT ANALYSIS	A. Earth	B. Air Quality	C. Surface Water	D. Biotic Resources	E. Noise	F. Light and Glare	G. Land Use	H. Transportation/Circulation	I. Public Services	1. Fire Protection	2. Police Protection	J. Energy Conservation	1. Electricity	2. Natural Gas	3. Construction	K. Utilities	1. Communications	2. Water	3. Sewer	4. Solid Waste	L. Risk of Upset	M. Aesthetics	NOTES
1. Antero A. Rivasplata Chief, State Clearinghouse State of California Governor's Office of Planning and Research 1400 Tenth Street Sacramento, CA 95814																										Includes Notice of Completion
2. Stephen J. Buswell IGR/CEQA Coordinator Transportation Planning Office Department of Transportation District 7, 120 So. Spring St. Los Angeles, CA 90012											●															
3. Viviane Doche-Boulos Intergovernmental Review Southern California Association of Governments Main Office 818 West Seventh Street, 12th Floor Los Angeles, CA 90017-3435	●				●					●	●	●							●		●	●	●	●		Employment Housing, Economic Issues
4. Charles W. Carry County Sanitation Districts of Los Angeles County 1955 Workman Mill Road Whittier, CA 90607-4998																						●				
5. G. William Lundgren, AICP Los Angeles County Metropolitan Transportation Authority One Gateway Plaza Los Angeles, CA 90012																										Request review period for extension

Draft Environmental Impact Report

Harbor Gateway Center

SUMMARY OF COMMENTS ON DRAFT EIR

		II. PROJECT DESCRIPTION	III. ENVIRONMENTAL SETTING	IV. ENVIRONMENTAL IMPACT ANALYSIS	A. Earth	B. Air Quality	C. Surface Water	D. Biotic Resources	E. Noise	F. Light and Glare	G. Land Use	H. Transportation/Circulation	I. Public Services	1. Fire Protection	2. Police Protection	J. Energy Conservation	1. Electricity	2. Natural Gas	3. Construction	K. Utilities	1. Communications	2. Water	3. Sewer	4. Solid Waste	L. Risk of Upset	M. Aesthetics	NOTES
6.	Thomas E. McMaster Assistant Fire Marshall Bureau of Fire Prevention and Public Safety													●								●					
7.	Robert B. Hansohn, Captain Area Commanding Office Harbor Community Police Station Los Angeles Police Department P.O. Box 30158 Los Angeles, CA 90030														●												
8.	Joan Friedman Environmental Review Unit Los Angeles Unified School District Facilities Services Division 365 South Grand Avenue, Suite 500 Los Angeles, CA 90072					●																					Impacts on schools
9.	Jodean M. Giese Supervisor of Environmental Assessment Business Team Department of Water and Power The City of Los Angeles 111 North Hope Street Los Angeles, CA 90051-0100																●					●					
10.	Robert Takasaki Senior Transportation Engineer Department of Transportation											●															Need for supplemental analysis of Alternatives

Draft Environmental Impact Report

Harbor Gateway Center

SUMMARY OF COMMENTS ON DRAFT EIR

	II. PROJECT DESCRIPTION	III. ENVIRONMENTAL SETTING	IV. ENVIRONMENTAL IMPACT ANALYSIS	A. Earth	B. Air Quality	C. Surface Water	D. Biotic Resources	E. Noise	F. Light and Glare	G. Land Use	H. Transportation/Circulation	I. Public Services	1. Fire Protection	2. Police Protection	J. Energy Conservation	1. Electricity	2. Natural Gas	3. Construction	K. Utilities	1. Communications	2. Water	3. Sewer	4. Solid Waste	L. Risk of Upset	M. Aesthetics	NOTES
11. Jack Sedwick Principal City Planner Community Planning Bureau Los Angeles City Planning Department 211 North Figueroa 16th Floor Los Angeles, CA										●															●	Cumulative Impacts
12. Glenn Hirano Assistant Division Engineer Development Services Division (Land Development) Bureau of Engineering				●							●												●			Mitigation Measures
13. Barbara Kilroy Department of Building and Planning 205 South Willowbrook Avenue Compton, CA 90020											●															
14. Kathy T. Ikari Community Development Director City of Gardena 1700 West 162nd Street Gardena, CA 90247-3778					●			●			●															Related Projects
15. Dale Neal LATHAM & WATKINS 633 West Fifth Street, Suite 4000 Los Angeles, CA 90071-2007	●										●															
16. Jerold B. Neuman ALLEN, MATKINS, LECK, GAMBLE & MALLORY 515 South Figueroa Street, Seventh Floor Los Angeles, CA 90071-3398	●				●			●		●	●														●	Alternatives, Related Projects/ Cumulative Impacts

COMMENT No. 1:

March 21, 1997

Antero A. Rivasplata
Chief, State Clearinghouse
State of California
Governor's Office of Planning and Research
1400 Tenth Street
Sacramento, CA 95814

Subject: HARBOR GATEWAY CENTER SCH #: 96051050

Comment 1.1:

The State Clearinghouse has submitted the above named draft Environmental Impact Report (EIR) to selected state agencies for review. The review period is now closed and the comments from the responding agency(ies) is(are) enclosed. On the enclosed Notice of Completion form you will note that the Clearinghouse has checked the agencies that have commented. Please review the Notice of Completion to ensure that your comment package is complete. If the comment package is not in order, please notify the State Clearinghouse immediately. Remember to refer to the project's eight-digit State Clearinghouse number so that we may respond promptly.

Please note that Section 21104 of the California Public Resources Code required that:

> "a responsible agency or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency."

Commenting agencies are also required by this section to support their comments with specific documentation.

These comments are forwarded for your use in preparing your final EIR. Should you need more information or clarification, we recommend that you contact the commenting agency(ies).

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental

Quality Act. Please contact at (916) 445-0613 if you have any questions regarding the environmental review process.

Response 1.1:

The Draft EIR was circulated for public review between February 6, 1997 and March 24, 1997. As noted in the attachment to the comment, the Draft EIR was circulated to state agencies for review and comment between February 5, 1997 and March 21, 1997. As noted, the Draft EIR for the project has complied with State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. No further response is necessary.

NOTICE OF COMPLETION

TO: STATE OF CALIFORNIA
OFFICE OF PLANNING AND RESEARCH
1400 TENTH STREET
SACRAMENTO, CA 95814

Project Title	Case No.
Harbor Gateway Center	EIR No. 96-0090-SUB(ZV)(CUB)(DA)

Project Location - Specific
1414 W. 190th Street between Western and Normandie Avenues in Harbor Gateway, California

Project Location - City	Project Location - County
Los Angeles	Los Angeles

Description of Nature, Purpose, and Beneficiaries of Project
The demolition of approximately 2.5 million square feet of industrial/warehouse facilities and construction of about 3 million square feet of retail, office, and industrial park development on a 170-acre site located on the south side of 190th Street, between Normandie and Western Avenues. Area 1, which occupies the northernmost 40 acres of the site, is to be developed with 450,000 square feet of retail uses, including about 355,000 square feet of large scale retailers, a maximum 65,000 square foot (4,000 seat) movie theater complex, and up to 30,000 square feet of restaurants. Area 2, which occupies the remainder of the site, is to be developed with about 500,000 square feet of office uses and 2 million square feet of industrial park uses.

McDonald Douglas Realty Company
4060 Lakewood Boulevard, Long Beach, CA 90808

Lead Agency	Division
City of Los Angeles	Department of City Planning Environmental Review Section 221 N. Figueroa St., Room 1500 Los Angeles, CA 90012

Review Period (Calendar Dates) Starting Date	Ending Date
February 6, 1997	March 24, 1997

Contact Person	Title	Area Code/Phone
Hadar Plafkin	City Planner	(213) 580-5554

State Clearinghouse Contact: Mr. Chris Belsky (916) 445-0613

Project Sent to the following State Agencies

State Review Began: 2-5-97

Dept. Review to Agency 3-14

Agency Rev to SCH 3-19

SCH COMPLIANCE 3-21

Please Note SCH Number on all Comments

96051050 [handwritten]

Please forward late comments directly to the Lead Agency

AQMD/APCD 33 (Resources: 2/8)

X	**Resources**
	Boating
	Coastal Comm
	Coastal Consv
	Colorado Rvr Bd
	Conservation
X	Fish & Game # 5
	Delta Protection
	Forestry
	Park & Rec/OHP
	Reclamation
	BCDC
X	DWR
	OES
	Bus Transp Hous
	Aeronautics
	CHP
X	Caltrans # 7
X	Trans Planning
	Housing & Devel
	Health & Welfare
	Drinking H2O
	Medical Waste

	State/Consumer Svcs
	General Services
	Cal/EPA
X	ARB
X	CA Waste Mgmt Bd
	SWRCB: Grants
	SWRCB: Delta
	SWRCB: Wtr Quality
	SWRCB: Wtr Rights
X	Reg. WQCB# 4
	DTSC/CTC
	Yth/Adlt Corrections
	Corrections
	Independent Comm
X	Energy Comm
	NAHC
	NAHC
	PUC
	Santa Mn Mtns
X	Sate Lands Comm
	Tahoe Rgl Plan
	Other: _____

COMMENT No. 2:

March 3, 1997

Stephen J. Buswell
IGR/CEQA Coordinator
Transportation Planning Office
Department of Transportation
District 7, 120 So. Spring St.
Los Angeles, CA 90012

Comment 2.1:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced project. The proposed project is a retail power center" and office/industrial park on a 170-acre site. The first phase consists of 450,000 square feet of retail development. The second and third phases include an estimated 1.3 million and 1.2 million square feet respectively of office/industrial park space.

> Based on our review of the Draft EIR for this project we have the following recommendation:
>
> Mitigation measures for the San Diego Freeway off-ramp/project driveway and 190th Street are described in Item 20- Page 235 of the document. In addition to these measures, a wrong way deterrent is needed at the Route 405 Southbound off-ramp at project driveway and 190th Street.

Response 2.1:

This improvement is being designed to meet Caltrans requirements. The project driveway will be aligned so that wrong-way movements are deterred (i.e., lanes from the off-ramp will be aligned with the inbound lanes of the project driveway while traffic on outbound driveway lanes will be restricted through signage and/or barriers from proceeding toward the off-ramp). Appropriate signing will also be utilized at the ramp as well as on the outbound driveway approaches and/or integrated with traffic signalization.

Comment 2.2:

We would like to remind you that this project's credits/debits need to be reported pursuant to MTA's CMP requirements.

Response 2.2:

The following table summarizes the CMP debits and credits for the project. As this table shows, full implementation of the mitigation program would result in over four times as many credits as debits for the project.

CMP Program Mitigation Credits

Intersection Number	Improvement Category	Credits
1	202	870
4	202	870
5	- -	- -
7	202	3,450
9	204	1,150
10	204	1,150
12	209	2,415
14	209	1,610
17	211	575
19	202	*
20	211	575
22	204	1,150
	209	1,935
23	202	*
	204	1,150
	209	1,935
24	202	*
	209	1,935
	211	575
25	(Project Serving)	- -
26	209	2,580
27	209	2,580
30	211	575
31	202	*

CMP Program Mitigation Credits
(continued)

Intersection Number	Improvement Category	Credits
	209	3,225
32	- -	- -
33	202	435
34	202	*
	204	1,150
	209	1,935
35	204	1,150
36	- -	- -
39	- -	- -
40	- -	- -
41	204	1,150
*	202	7,250
Total		43,375

Legend:

**:* *190th Street Added Lanes*
202: *General Use Highway Lane*
204: *Freeway On/Off-Ramp Addition or Modification*
209: *Traffic Signal Surveillance and Control*
211: *Intersection Modification*

CMP Program Mitigation Debits

Project Component	Size	Rate	Debit Value
Construction			
4 Commercial	450.0 ksf	17.80	8,010
7 Industrial	2,010.7 ksf	6.80	12,225
8 Office	507.0 ksf	7.35	3,726
Subtotal	**2,967.7 ksf**		**23,961**
Less Demolition			
7 Industrial	2,419.0 ksf	6.08	14,708
Total Project CMP Debits			9,253
Less CMP Mitigation Credit Value			43,375
Net Project CMP Debits (Credits)			(34,122)

Comment 2.3:

A Caltrans Encroachment Permit is needed in all instances where the proposed work or transportation related mitigation measures falls within the State right-of-way. We recommend that the applicant submit an application along with six (6) sets of engineering plans to the Caltrans Permits Office for review.

Thank you for this opportunity to comment. If you have any questions, regarding these comments, please call me at (213) 897-4429.

Response 2.3:

The project will comply with applicable Caltrans requirements for all roadway improvements within State rights-of-way. The Permits Office has been contacted regarding this project and preliminary engineering plans are being prepared.

COMMENT No. 3:

February 27, 1997

Viviane Doche-Boulos
Intergovernmental Review
Southern California Association of Governments
Main Office
818 West Seventh Street, 12th Floor
Los Angeles, CA 90017-3435

RE: **Comments on the City of Los Angeles, Draft Environmental Impact Report for Harbor Gateway Center - SCAG No. I 9700050**

Comment 3.1:

Thank you for submitting the **City of Los Angeles, Draft Environmental Impact Report for Harbor Gateway Center** to SCAG for review and comment. As areawide clearinghouse for regionally significant projects, SCAG assists cities, counties and other agencies in reviewing projects and plans for consistency with regional plans.

The attached detailed comments are meant to provide guidance for considering the proposed project within the context of our regional goals and policies. If you have any questions regarding the attached comments, please contact Bill Boyd at (213) 236-1960.

Response 3.1:

State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act have been completed. The Draft EIR has been submitted to the State Clearinghouse and distributed to the Southern California Association of Governments (SCAG), among other agencies, for a 45-day public review period. Consistency of the proposed project with applicable plans is discussed in Section IV.G, Land Use of the Draft EIR.

COMMENTS ON THE CITY OF LOS ANGELES HARBOR GATEWAY CENTER DRAFT ENVIRONMENTAL IMPACT REPORT

Comment 3.2:

PROJECT DESCRIPTION

The proposed Project involves the demolition of approximately 2.4 million square feet of industrial/warehouse facilities and the construction of about 3 million square feet of retail, office, and industrial park development on a 170 acre site located on the south side of 190th Street, between Normandy [sic] and Western Avenues, in the City of Los Angeles. Area 1, which occupies the northernmost 40 acres of the site, is to be developed with 450,000 square feet of retail uses, including about 355,000 square feet of large scale retailers, a maximum 65,000 square foot (4,000 seat) movie theater complex, and up to 30,000 square feet of restaurants. Area 2, which occupies the remainder of the site is to be developed with about 500,000 square feet of office uses and 2 million square feet of industrial park uses.

The Draft EIR evaluates six alternatives to the proposed Project: Alt. 1 -- No Project; Alt. 2 -- Master Planner [sic] Block Development (current plan plus adjacent International Metals site); Alt. 3 -- Alternative Land Use (different mix of land uses with more intensive office/industrial); Alt. 4 -- Reduced Intensity (same uses but 25% reduction in intensity); Alt. 5 -- Golf Course (same Area 1 but 130.2 acre, 18 hole golf course in Area 2); and, Alt. 6 -- Large Parcelization (entire site developed for office/industrial use).

INTRODUCTION TO SCAG REVIEW PROCESS

The document that provides the primary reference for SCAG's project review activity is the Regional Comprehensive Plan and Guide (RCPG). The RCPG chapters fall into three categories: core, ancillary, and bridge. The Growth Management (adopted June 1994), Regional Mobility (adopted June 1994), Air Quality (adopted October 1995), Hazardous Waste Management (adopted November 1994), and Water Quality (adopted January 1995) chapters constitute the core chapters. These core chapters respond directly to federal and state planning requirements. The core chapters constitute the base on which local governments ensure consistency of their plans with applicable regional plans under CEQA. The Air Quality and Growth Management chapters contain both core and ancillary policies, which are differentiated in the comment portion of this letter. The Regional Mobility Element (RME) constitutes the region's Transportation Plan. The RME policies are incorporated into the RCPG.

Ancillary chapters are those on the Economy, Housing, Human Resources and Services, Finance, Open Space and Conservation, Water Resources, Energy, and Integrated Solid Waste Management. These chapters address important issues facing the region and may reflect other regional plans. Ancillary chapters, however, do not contain actions or policies required of local government. Hence, they are entirely advisory and establish no new mandates or policies for the region.

Bridge chapters include the Strategy and Implementation chapters, functioning as links between the Core and Ancillary chapters of the RCPG.

Each of the applicable policies related to the proposed project are identified by number and reproduced below in italics followed by SCAG staff comments regarding the consistency of the project with those policies.

Response 3.2:

This comment reiterates data presented in the Draft EIR and provides context for the analysis of project consistency with SCAG regional goals and policies which follows, and therefore, does not require a response.

Comment 3.3:

Consistency With Regional Comprehensive Plan and Guide Policies

1. The Growth Management Chapter (GMC) of the Regional Comprehensive Plan contains a number of policies that are particularly applicable to this Specific Plan.

a. *Core Growth Management Policies*

3.01 The population, housing, and jobs forecasts, which are adopted by SCAG's Regional Council and that reflect local plans and policies, shall be used by SCAG in all phases of implementation and review.

SCAG staff comments. As SCAG has designated subregions, the project is situated in the City of Los Angeles subregion. Implementation of the project would result in the creation of about 5,000 jobs at buildout, which represents about 3 percent of the subregion's employment growth between 1996 and 2010. The Project is consistent with this RCPG policy.

Response 3.3:

This comment identifies the proposed project's consistency with adopted regional policy and does not require a response. This comment will be forwarded to the decision-makers.

Comment 3.4:

3.03 The timing, financing, and location of public facilities, utility systems, and transportation systems shall be used by SCAG to implement the region's growth policies.

SCAG staff comments: The Draft EIR contains a limited amount of information concerning this policy, especially the coordination of public facilities, utility systems and transportation with the timing and financing proposed project. Estimated buildout for Area 1 would be 1998 and 2006 for Area 2. It is not possible to determine the degree to which the proposed Project is consistent with this policy.

Response 3.4:

Implementation of the proposed project would involve the redevelopment of an existing, obsolete manufacturing facility. In general, the project involves infill development in an already highly urbanized area and/or the redevelopment of already developed parcels. Because the project site is already developed and is located in a highly urbanized setting, the proposed redevelopment of the site would generally utilize existing infrastructure and would not involve any substantial extension of new infrastructure, such as roads and utilities. Existing infrastructure systems will be upgraded and phased to accommodate new development as it comes on line.

Proposed on-site development activity includes the construction and operation of up to a maximum of nearly three million square feet of retail and office/industrial park development. Given that about 2.4 million square feet of existing structures would be demolished as part of the project, the net increase in on-site building area would be a maximum of approximately 550,000 square feet.

The proposed project would include the development of an internal road system on the project site. All roadways would be constructed to City of Los Angeles standards. The proposed circulation system, described and illustrated in Section II Project Description of the Draft EIR, would provide seven public entrances. These would include three entrances on 190th Street, three on Normandie Avenue, and one on Western Avenue. All streets located on the project

site would include curb adjacent sidewalks for pedestrian movement. Where bus stops are located adjacent to the site, direct pedestrian circulation would be provided from the bus stop to the site, where practical. A total of 2,200 surface parking spaces are proposed to serve Area 1 development. Although parking lots have not been designed for Area 2, parking for Area 2 development would be provided in accordance with City requirements, either in surface lots or structures. Designated spaces would be provided in convenient locations for handicap, carpool, motorcycle, and bicycle parking, as required by the City of Los Angeles.

As stated in the Draft EIR, it is assumed that full project buildout will be completed in 2006, however, although general building parameters have been developed, specific site development will be governed by market forces. Therefore, it would be speculative at this time to project specific timing and infrastructure requirements for specific sites within the office/industrial park portion of the project site. However, the project will provide adequate infrastructure and roadway systems before individual projects become operational and will comply with all City of Los Angeles requirements in place at the time that the sites are actually developed. The project would be generally consistent with the RCPG policy to coordinate regional growth with timely provision of public facilities, utility systems and transportation systems.

b. Ancillary Growth Management Policies

Comment 3.5:

3.04 Encourage local jurisdictions' efforts to achieve a balance between the types of jobs they seek to attract and housing prices.

SCAG staff comments. The Draft EIR contains a limited amount of information concerning this policy, especially the types of jobs in relationship to availability of adequately priced housing in the vicinity of the proposed project. It is not possible to determine the degree to which the proposed Project is consistent with this policy.

Response 3.5:

As compared to existing conditions at the McDonnell Douglas facility, project buildout would have the potential to add over 4,600 jobs (roughly 5,000 new jobs less 380 current on-site employees). Such an increase in on-site employment may lead some people to relocate to the area to be nearer their jobs, thereby creating some demand for additional housing in the area. At its peak around 1990, however, the McDonnell Douglas facility employed approximately 5,500 people. Since that time, employment on the site has steadily declined, consistent with

the general decline in employment in the southern California aerospace industry. Most manufacturing activities on-site have been either phased out or moved to other McDonnell Douglas facilities. About 380 employees remain on the site, most of whom are involved in warehousing and distribution activities. This indicates that there is a surplus of workers who are available to accept new job opportunities associated with new development. Consequently, the primary effect of adding jobs on-site would be to replace local jobs that have been lost over the past six years. Therefore, it is expected that many of the additional employment opportunities will be captured by persons already living within Harbor Gateway or other South Bay communities. Accordingly demand for additional housing associated with the project itself is therefore expected to be minimal.

Further, as part of its long-term goal of redeveloping the project site, McDonnell Douglas plans to eventually phase out the current warehousing activities on the project site and relocate such activity, either to its existing Long Beach or St. Louis facilities, or to a new state-of-the-art distribution facility on the project site. In place of the current uses, the company plans to develop a mix of retail and office/industrial park uses that would provide a logical extension of the pattern of retail and office park development that has occurred in the Harbor Gateway area in recent years. Thus, the project would contribute to the ongoing redevelopment of the Harbor Gateway community. In general, the change from the current heavy industrial uses to a mix of light industrial, office, and retail uses is consistent with local land use trends. As discussed in the Draft EIR, Section IV.G, Land Use, such changes for the project site and site vicinity are also consistent with the long-term goals and vision for the area, as articulated in the City of Los Angeles General Plan and Harbor Gateway District Plan and as such would be consistent with the housing needs anticipated for the area. Thus, the project would be generally consistent with this RCPG policy.

Comment 3.6:

3.05 Encourage patterns of urban development and land use which reduce costs on infrastructure construction and make better use of existing facilities.

SCAG staff comments. The Draft EIR references and appropriately addresses this policy on page 196. The Project is consistent with this RCPG policy.

Response 3.6:

This comment identifies the proposed project's consistency with adopted regional policy and does not require a response. This comment will be forwarded to the decision-makers.

Comment 3.7:

3.08 Encourage subregions to define an economic strategy to maintain the economic vitality of the subregion, including the development and use of marketing programs, and other economic incentive, which support attainment of subregional goals and policies.

SCAG staff comments. The Draft EIR references the consistency of the proposed Project with the economic strategies in the Harbor Gateway District Plan, noting the area as a regional employment and transportation hub. The Draft EIR acknowledges that implementation of the proposed Project will help in the areas economic recovery from aerospace job loss at the McDonnel [sic] Douglas Corporation plant by creating new retail, office and industrial jobs in an amount nearly equivalent to lost jobs. The Project is consistent with this RCPG policy.

Response 3.7:

This comment identifies the proposed project's consistency with adopted regional policy and does not require a response. This comment will be forwarded to the decision-makers.

Comment 3.8:

3.09 Support local jurisdictions' efforts to minimize the cost of infrastructure and public service delivery, and efforts to seek new sources of funding for development and the provision of services.

SCAG staff comments: The Draft EIR references and appropriately addresses this policy on page 196. The Project is consistent with this RCPG policy.

Response 3.8:

This comment identifies the proposed project's consistency with adopted regional policy and does not require a response. This comment will be forwarded to the decision-makers.

Comment 3.9:

3.10 Support local jurisdictions' actions to minimize red tape and expedite the permitting process to maintain economic vitality and competitiveness.

SCAG staff comments. The Draft EIR acknowledges the use of flexible growth management policies, development regulations, standards, design guidelines and would therefore be supportive of this RCPG policy.

Response 3.9:

This comment acknowledges the proposed project's use of flexible growth management policies, development regulations, standards, design guidelines as supportive of adopted regional policy and does not require a response. This comment will be forwarded to the decision-makers.

Comment 3.10:

3.11 Support provisions and incentives created by local jurisdictions to attract housing growth in job rich subregions and job growth in housing subregions.

SCAG staff comments. The Draft EIR references and appropriately addresses this policy on page 196. The Project is consistent with this RCPG policy.

Response 3.10:

This comment identifies the proposed project's consistency with adopted regional policy and does not require a response. This comment will be forwarded to the decision-makers.

Comment 3.11:

3.12 Encourage existing or proposed local jurisdictions' programs aimed at designing land uses which encourage the use of transit and thus reduce the need for roadway expansion, reduce the number of auto trips and vehicle miles traveled, and create opportunities for residents to walk and bike.

SCAG staff comments. The Draft EIR references and appropriately addresses this policy on page 196. The Project is consistent with this RCPG policy.

Response 3.11:

This comment identifies the proposed project's consistency with adopted regional policy and does not require a response. This comment will be forwarded to the decision-makers.

Comment 3.12:

3.13 Encourage local jurisdictions' plans that maximize the use of existing urbanized areas accessible to transit through infill and redevelopment.

SCAG staff comments. The Draft EIR references and appropriately addresses this policy on page 196. The Project is consistent with this RCPG policy.

Response 3.12:

This comment identifies the proposed project's consistency with adopted regional policy and does not require a response. As noted in the Draft EIR, the project site is accessible by transit. This comment will be forwarded to the decision-makers.

Comment 3.13:

3.16

Encourage developments in and around activity centers, transportation node corridors, underutilized infrastructure systems, and areas needing recycling and redevelopment.

SCAG staff comments. The Draft EIR references and appropriately addresses this policy on page 196. The Project is consistent with this RCPG policy.

Response 3.13:

This comment identifies the proposed project's consistency with adopted regional policy and does not require a response. The project involves recycling of an industrial site currently occupied by underutilized warehousing facilities and represents a substantial increase in the use of the site. This comment will be forwarded to the decision-makers.

Comment 3.14:

3.18 Encourage planned development in locations least likely to cause adverse environmental impact.

SCAG staff comments. The Draft EIR references and appropriately addresses this policy on page 196. The Project is consistent with this RCPG policy.

Response 3.14:

This comment identifies the proposed project's consistency with adopted regional policy and does not require a response. This comment will be forwarded to the decision-makers.

Comment 3.15:

3.26 Encourage employment development in job-poor localities through support of labor force retraining programs and other economic development measures.

SCAG staff comments. The Draft EIR references and appropriately addresses this policy on page 196. The Project is consistent with this RCPG policy.

Response 3.15:

This comment identifies the proposed project's consistency with adopted regional policy and does not require a response. This comment will be forwarded to the decision-makers.

Comment 3.16:

2. The Regional Mobility Chapter (RMC) also has policies, all of which are core, that pertain to the proposed project. This chapter links the goal of sustaining mobility with the goals of fostering economic development, enhancing the environment, reducing energy consumption, promoting transportation-friendly development patterns, and encouraging fair and equitable access to residents affected by socio-economic, geographic and commercial limitations. Among the relevant policies in this chapter are the following:

Transportation Demand Management and Regional Transit Program Policies

4.01 Promote Transportation Demand Management programs along with transit and ridesharing facilities as a viable and desirable part of the overall program while recognizing the particular needs of individual subregions.

4.03 Support the extension of TDM program implementation to non-commute trips for public and private sector activities.

4.04 Support the coordination of land use and transportation decisions with land use and transportation capacity, taking into account the potential for demand management strategies to mitigate travel demand if provided for as a part of the entire package.

4.06 Support efforts to educate the public on the efficacy of demand management strategies and increase the use of alternative transportation.

4.07 Public transportation programs should be considered an essential public service because of their social, economic, and environmental benefits.

SCAG staff comments. The Draft EIR's Air Quality and Transportation/Circulation chapters adequately address the provision of TDM and transit services. Appropriate mitigation measures are included to assure that these needs are dealt with. The Project is consistent with the five TDM/transit RCPG policies.

Response 3.16:

This comment acknowledges that the Draft EIR's Air Quality and Transportation/Circulation chapters adequately address the provision of Transportation Demand Management (TDM) and transit services including the provision of appropriate mitigation measures. The comment concludes that the project is consistent with the five TDM/transit Regional Comprehensive Plan and Guide Policies and accordingly does not require a response. This comment will be forwarded to the decision-makers.

Comment 3.17:

Regional Streets and Highways Program Policies

4.10 Potential down-stream congestion impacts from capacity enhancing projects will be studied.

SCAG staff comments. The Draft EIR indicates that capacity enhancements will be required on a number of major arterials and intersections, in part, to serve transportation demand generated from the proposed Project. SCAG's Regional Travel Forecast Model was adjusted to reflect local development proposals and served as basis for analysis of the project's transportation impacts. The Draft EIR acknowledges that significant traffic impacts would remain at four intersections and three freeway locations that could not be

mitigated below a level of significance. The proposed Project is consistent with this RCPG policy, although there remains some unavoidable significant impacts.

Response 3.17:

This comment acknowledges that although some unavoidable significant traffic impacts remain, the project is consistent with this RCPG policy and does not require a response. This comment will be forwarded to the decision-makers.

Comment 3.18:

4.20 Expanded transportation system management by local jurisdictions will be encouraged.

4.23 TSM activities throughout the region shall be coordinated among jurisdictions.

SCAG staff comments. The Draft EIR references a number of on- and off-site transportation system management actions and mitigation measures, such as traffic signals, Automated Traffic Surveillance and Control (ATSAC), and intersection improvements to speed the flow of traffic. The Project is consistent with these two RCPG policies.

Response 3.18:

This comment identifies the proposed project's consistency with adopted regional policy and does not require a response. This comment will be forwarded to the decision-makers.

Comment 3.19:

Regional Non-Motorized Transportation Program Policies

4.25 The development of the regional transportation system should include a non-motorized transportation system that provides an effective alternative to auto travel for appropriate trips. The planning and development of transportation projects and systems should incorporate the following, as appropriate:

a • Provision of safe, convenient, and continuous bicycle and pedestrian infrastructure to and throughout areas with existing and potential demand such as activity areas, schools, recreational areas (including those areas

served by trails), which will ultimately offer the same or better accessibility provided to the motorized vehicle.

b • *Accessibility to and on transit (bus terminals, rail stations, Park-And-Ride lots), where there is demand and where transit boarding time will not be significantly delayed.*

c • *Maintenance of safe, convenient, and continuous non-motorized travel during and after the construction of transportation and general development projects. Existing bikeways and pedestrian walkways should not be removed without mitigation that is as effective as the original facility.*

SCAG staff comments. See comment under policy 3.12. The Project is consistent with this RCPG policy.

Response 3.19:

This comment identifies the proposed project's consistency with adopted regional policy and does not require a response. This comment will be forwarded to the decision-makers.

Comment 3.20:

4.27 Urban form, land use and site-design policies should include requirements for safe and convenient non-motorized transportation, including the development of bicycle and pedestrian-friendly environments near transit.

SCAG staff comments. The Specific Plan includes urban form, land use and site-design policies that support non-motorized transportation as noted previously under SCAG policies 3.12 and 4.25. The Project is consistent with this RCPG policy.

Response 3.20:

This comment identifies the proposed project's consistency with adopted regional policy and does not require a response. As noted in the Draft EIR, the project is planned to include pedestrian enhancements designed to encourage transit use. This comment will be forwarded to the decision-makers.

Comment 3.21:

3. The Air Quality Chapter (AQC) core actions that are generally applicable to the proposed Project are as follows:

5.07 Determine specific programs and associated actions needed (e.g., indirect source rules, enhanced use of telecommunications, provision of community based shuttle services, provision of demand management based programs, or vehicle-miles-traveled/emission fees) so that options to command and control regulations can be assessed.

SCAG staff comments. The propose [sic] Project's two TDM mitigation measures: compliance with Ordinance No. 168,700 (Transportation Demand Management and Trip Reduction Measures) and compliance with SCAQMD Rule 2202 reflect an openness to look at new technologies. Consideration should be given to approaches which provide for telecommunications and community based shuttle services and which utilize new clean air technologies. The Project is consistent with this RCPG policy.

Response 3.21:

This comment identifies the proposed project's consistency with adopted regional policy and does not require a response. As also noted in the Draft EIR, in Section IV.K.1, Communications, the project is expected to incorporate state-of-the-art telephone, broadband communications and video service, as well as wireless telephone and satellite video services, to maximize opportunities for reducing air emissions by minimizing traffic generation. This comment will be forwarded to the decision-makers.

Comment 3.22:

5.11 Through the environmental document review process, ensure that plans at all levels of government (regional, air basin, county, subregional and local consider air quality, land use, transportation and economic relationships to ensure consistency and minimize conflicts.

SCAG staff comments: The Draft EIR (Land Use, Air Quality and Transportation/ Circulation chapters) include [sic] specific reference to this SCAG policy and details how the Specific Plan [sic] addresses land use, transportation and economic interrelationships which help to minimize motor vehicle trips and improve air quality. The Project is consistent with this RCPG policy.

The Draft EIR under review does not require a federal action, so is not subject to a finding of air quality conformity.

Response 3.22:

This comment identifies the proposed project's consistency with adopted regional policy and does not require a response. This comment will be forwarded to the decision-makers.

Comment 3.23:

4. The Water Quality Chapter (WQC) core recommendations and policy options relate to the two water quality goals: to restore and maintain the chemical, physical and biological integrity of the nation's water; and, to achieve and maintain water quality objectives that are necessary to protect all beneficial uses of all waters. The core recommendations and policy options that are particularly applicable to the proposed Project include the following:

11.06 Clean up the contamination in the region's major groundwater aquifers since its water supply is critical to the long-term economic and environmental health of the region. The financing of such clean-ups should leverage state and federal resources and minimize significant impacts on the local economy.

SCAG staff comments: The Draft EIR addresses the problem of contaminated soils and groundwater, some of which is the result of off-site activity. Appropriate mitigation measures are presented to deal with soil and groundwater contamination, contamination from the Montrose Chemical Superfund Site chlorobenzene and chloroform pollution resulting from manufacture of DDT) and on-site asbestos contamination. The Project is consistent with this RCPG policy.

Response 3.23:

This comment acknowledges that the Draft EIR adequately addresses the issue of contaminated soils and groundwater, some of which is the result of off-site activity, including the provision of appropriate mitigation measures. The comment concludes that the project is consistent with the Regional Comprehensive Plan and Guide Policies and accordingly does not require a response. This comment will be forwarded to the decision-makers.

Comment 3.24:

11.07 Encourage water reclamation throughout the region where it is cost-effective, feasible, and appropriate to reduce reliance on imported water and wastewater discharges. Current administrating impediments to increased use of wastewater should be addressed.

SCAG staff comments: The Draft EIR acknowledges the possible use of reclaimed water for landscape mitigation, upon its availability from either the Department of Water and Power or Dominguez Water Company. The Project is consistent with this RCPG policy.

Response 3.24:

This comment acknowledges that the Draft EIR adequately addresses the use of reclaimed water. However, only Dominguez Water Company has indicated that it may supply reclaimed water to this area in the future. LADWP has not given any such indication for this project. The comment concludes that the project is consistent with the Regional Comprehensive Plan and Guide Policies and accordingly does not require a response. This comment will be forwarded to the decision-makers.

Comment 3.25:

11.08 Ensure wastewater treatment agency facility planning and facility development be consistent with population projections contained in the RCPG, while taking into account the need to build wastewater treatment facilities in cost-effective increments of capacity, the need to build well enough in advance to reliably meet unanticipated service and storm water demands, and the need to provide standby capacity for public safety and environmental protection objectives.

SCAG staff comments: The Draft EIR acknowledges on page 282 that the Joint Water Pollution Control Plant of the Sanitation Districts of Los Angeles County (SDLAC) "has the capacity to serve projected future needs". The wastewater disposal section should acknowledge that the SDLAC Facilities Plan bases its projections for wastewater generation on the SCAG population projections". The Project is consistent with this RCPG policy.

Response 3.25:

This comment reiterates data presented in the Draft EIR. The statement that the SDLAC Facilities Plan bases its projections for wastewater generation on the SCAG population projections is noted. No further response is necessary.

Comment 3.26:

INTEGRATED SOLID WASTE MANAGEMENT CHAPTER OF THE REGIONAL COMPREHENSIVE PLAN AND GUIDE

The Integrated Solid Waste Management Chapter (ISWM) is non mandated; it is provided for information and advisory purposes. The recommendations in the chapter fulfill the chapter's objectives and do not create new legal mandates for local governments or other regional governmental organizations, like sanitation or waste management districts. The chapter includes the following goals:

Solid Waste Goals

- *Promote the following waste management practices in order of priority:*

1. *Waste Prevention.*
2. *Recycling and Composting.*
3. *Safe Disposal or Transformation.*

SCAG staff comments: The proposed Project addresses some actions to promote waste prevention, recycling and composting, and the safe disposal of remaining waste materials. Some of the information in the Solid Waste section concerning available landfill capacity is out of date (BKK and Azusa landfills are now closed) and may be inconsistent with the City of Los Angeles's *Source Reduction and Recycling Element,* and the more recent *Draft Countywide Integrated Waste Management Plan (Summary Plan and Siting Element).* The Draft EIR acknowledges the intent to complete a Solid Waste and Resources Action Plan as a proposed mitigation measure.

Response 3.26:

As indicated in the Draft EIR, Section IV.K.4, Solid Waste, the BKK and Azusa landfills were scheduled to close per legal settlement in 1996 and 1997 respectively. These landfills are now

closed. See Corrections and Additions No. 9a. Although the provisions of the Integrated Solid Waste Management Chapter are non-mandated, as acknowledged by the comment, the project addresses actions to promote waste prevention, recycling and composting, and the safe disposal of remaining waste materials. Further, the Draft EIR includes a Solid Waste and Resources Action Plan as a proposed mitigation measure.

Comment 3.27:

Conclusions and Recommendations:

(1) As noted in the staff comments, the Project is consistent with most of the aforementioned policies of the Regional Comprehensive Plan and Guide. In a few instances, for SCAG Policy 3.03 and 3.04, consistency could not be determined.

Response 3.27:

This comment identifies the proposed project's consistency with most of the policies of the Regional Comprehensive Plan and Guide. In the two instances, for which SCAG staff could not determine consistency (Comments 3.4 and 3.5 above), additional discussion is provided above as responses to the specific staff comments (See Responses 3.4 and 3.5).

Comment 3.28:

(2) All mitigation measures associated with the project should be monitored in accordance with AB 3180 requirements and reported to SCAG through the Annual Reasonable Further Progress Reports.

Response 3.28:

Pursuant to California Public Resources Code Section 21081.6, public agencies are required to adopt a mitigation monitoring plan for assessing and ensuring sufficiency and enforceability of any required mitigation measures applied to proposed development. A proposed Mitigation Monitoring Plan has been submitted to the Planning Department. This Mitigation Monitoring Plan is designed to monitor implementation of all feasible mitigation measures for the proposed project identified in the EIR. In addition, the mitigation measures will be incorporated within the Conditions of Approval established for the project's subdivision action. The project will be required to comply with all Conditions of Approval established by the City of Los Angeles.

THE FOLLOWING ADDITIONAL ATTACHMENT TO THIS LETTER LISTS THE ROLES AND AUTHORITIES OF SCAG. NO RESPONSE TO THIS ATTACHMENT IS NECESSARY.

SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS

Roles and Authorities

THE SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS is a *Joint Power Agency* established under California's Government Code Section 6502 et seq. Under federal and state law, the Association is designated as a Council of Government (COG), a Regional Transportation Planning Agency (RTPA), and a Metropolitan Planning Organization (MPO). Among the other mandated roles and responsibilities, the Association is:

- Designated by the federal government as the Region's *Metropolitan Planning Organization* and mandated to maintain a continuing, cooperative, and comprehensive transportation planning process resulting in a Regional Transportation Plan and a Regional Transportation Improvement Program pursuant to 23 U.S.C. §134(g)-(h), 49 U.S.C. §1607(f)-(g) et seq., 23 C.F.R. §450, and 49 C.F.R. §613. The Association is also the designated *Regional Transportation Planning Agency*, and as such is responsible for both preparation of the Regional Transportation Plan (RTP) and Regional Transportation Improvement Program (RTIP) under California Government Code Section 65080

- Responsible for developing the demographic projections and the integrated land use, housing, employment, and transportation programs, measures, and strategies portions of the *South Coast Air Quality Management Plan*, pursuant to California Health and Safety Code Section 40460(b)-(c). The Association is also designated under 42 U.S.C. §7504(a) as a *Co-Lead Agency* for air quality planning for the Central Coast and Southeast Desert Air Basin District.

- Responsible under the Federal Clean Air Act for determining *Conformity* of Projects, Plans and Programs to the State Implementation Plan, pursuant to 42 U.S.C. §7506.

- Responsible, pursuant to California Government Code Section 65089.2, for *reviewing all Congestion Management Plans (CMPs) for consistency with regional transportation plans* required by Section 65080 of the Government Code. The Association must also evaluate the consistency and compatibility of such programs within the region.

- The authorized regional agency for *Inter-Governmental Review* of Programs proposed for federal financial assistance and direct development activities, pursuant to Presidential Executive Order 12,372 (replacing A-95 Review).

- Responsible for reviewing, pursuant to Sections 15125(b) and 15206 of the CEQA Guidelines, *Environmental Impact Reports* of projects of regional significance for consistency with regional plans.

- The authorized *Areawide Waste Treatment Management Planning Agency*, pursuant to 33 U.S.C. §1288(a)(2) (Section 208 of the Federal Water Pollution Control Act).

- Responsible for preparation of the *Regional Housing Needs Assessment*, pursuant to California Government Code Section 65584(a).

- Responsible (along with the San Diego Association of Governments and the Santa Barbara County/Cities Area Planning Council) for preparing the *Southern California Hazardous Waste Management Plan* pursuant to California Health and Safety Code Section 25135.3.

COMMENT No. 4:

March 13, 1997

Charles W. Carry
County Sanitation Districts
of Los Angeles County
1955 Workman Mill Road
Whittier, CA 90607-4998

Harbor Gateway Center

Comment 4.1:

The County Sanitation Districts of the Los Angeles County (Districts) received a Draft Environmental Impact Report for the subject project on February 11, 1997. The proposed development is located within the jurisdictional boundaries of District No. 5. We offer the following corrections to the Draft EIR:

1. Sewer, Environmental Setting. page 277

The first paragraph of this section should read as follows:

Wastewater generated at the McDonnell Douglas property is treated by the Sanitation Districts of Los Angeles County (CSDLAC). The main sewer lines that serve the project site vicinity include the District No. 5 Interceptor Trunk Sewer, which ranges in diameter from 63 to 66 inches, and an adjacent 57-inch line, both located in a 15-foot wide easement in Normandie Avenue. Please refer to Figure 31 on page 278, for an illustration of existing (and proposed) local sewer lines. The CSDLAC plans to close either the District No. 5 Interceptor Trunk Sewer or the 57-inch line in 1998. New connections are allowed and existing connections can be used by new developments. Plans for existing connections have not yet been determined. In addition, CSDLAC is not permitting any new connections to a 90-inch line in Western Avenue.

Response 4.1:

The requested change has been made. See Corrections and Additions No. 8a.

Comment 4.2:

After reviewing the third paragraph of this section regarding the Industrial Wastewater permits, several discrepancies were noted as follows:

To begin, the Industrial Wastewater Discharge Permits No. 799 and No. 800, which were issued to McDonnell Douglas Corporation at the 19503 S. Normandie Avenue situs address, are no longer active. Permits No. 799 and No. 800 were voided on May 15, 1996 and August 21, 1996, respectively. Hence, the discharge at the site is currently not regulated under any industrial waste permit. In addition, Permit No. 800 was reapproved in 1981, not 1991.

Although the baseline sewer capacity units established at the site is 1896.44, the Districts does not recognize or establish a baseline flow. The baseline capacity units was [sic] established from the 1976-77 Surcharge Statement which reported a discharge flowrate of 618,840 gpd. The 660,285 gpd flowrate is the total combined permit flowrates issued to Permits No. 799 (110,285 gpd) and No. 800 (550,000 gpd) and includes only industrial wastewater, not sanitary. The 660,285 gpd flow does not translate to 241.0 million gallons annually (based on 365 discharge days per year) since McDonnell Douglas Corporation was only discharging five days per week. Last, the Districts does not have any information available to verify if the company is currently discharging 6.6 million gallons per year. Both permits were voided after inspections verified industrial wastewater was no longer being discharged at the site. For additional information regarding the above Industrial Wastewater Discharge permits, please contact Ms. Alicia Jaurequi in our Industrial Waste Department.

If you have any questions, please contact the undersigned at (562) 699-7411, extension 2717.

Response 4.2:

The EIR has been changed to reflect the voiding of Industrial Wastewater Permit Nos. 799 and 800 as indicated in the comment. See Corrections and Additions No. 8b. According to the CSDLAC, however, the total of 1896.44 sewer capacity units previously purchased for the site by McDonnell Douglas remain attached to the project site, where they entitle discharge of wastewater (either industrial or sanitary) to the sewer system at levels of approximately 660,285 gallons per day, or approximately 172.0 million gallons per year. The entitlement to discharge may be transferred from the current owner (McDonnell Douglas) to another property owner

within the project site if some or all of the McDonnell Douglas property is sold. If a new use on the project site has a requirement to discharge industrial wastewater, a new Industrial Wastewater Discharge Permit would need to be obtained from CSDLAC by that user, in addition to acquiring the requisite number of sewer capacity units to accommodate that project's discharge to the sewer system. This information has been added to the Final EIR. See Corrections and Additions No. 8d.

COMMENT No. 5:

March 12, 1997

G. William Lundgren, AICP
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, CA 90012

Subject: Harbor Gateway Center

Comment 5.1:

The Los Angeles County Metropolitan Transportation Authority (MTA) appreciates the opportunity to provide comment on the Draft EIR prepared for the above project. However, an insufficient amount of time has been provided. Though the Notice of Completion and the Draft EIR both bear the same issuance date of February 6, 1997, we did not receive the notice or the document until March 3, 1997. We therefore request your accommodation of an additional two weeks to allow for circulation and review by our staff. Comments will be received by you on or before April 4, 1997.

Thank you for your consideration of our request. For purposes of CEQA document review, please make certain you are using the following address:

G. William Lundgren, AICP
Congestion Management Program
MTA
One Gateway Plaza, Mail Stop 99-23-2
Los Angeles, CA 90012-2932

Response 5.1:

The requested extension was granted to MTA by the Department of City Planning. However, no further correspondence was received from MTA prior to completion of the Final EIR.

COMMENT No. 6:

March 13, 1997

TO: Con Howe, Director
Department of City Planning

FROM: Fire Department

SUBJECT: HARBOR GATEWAY CENTER - DRAFT ENVIRONMENTAL IMPACT REPORT (EIR) - REQUEST FOR COMMENTS - EIR 96-0090 - SUB (ZV) (CUB) (DA)

Comment 6.1:

The proposed project consists of the demolition of approximately 2.4 million square feet of industrial/warehouse facilities and construction of about 3 million square feet of retail, office, and industrial park development on a 170-acre site located on the south side of 190th Street, between Normandie and Western Avenues. Area One [sic], which occupies the northernmost 40 acres of the site, is to be developed with 450,000 square feet of retail uses, including about 355,000 square feet of large scale retailers, a maximum 65,000 square foot (4,000 seat) movie theater complex, and up to 30,000 square feet of restaurants. Area Two [sic], which occupies the remainder of the site, is to be developed with about 500,000 square feet of office uses and 2 million square feet of industrial park uses.

The following comments are furnished in response to your request for this Department to review the proposed development:

A. FIRE FLOW

The adequacy of fire protection for a given area is based on required fire-flow, response distance from existing fire stations, and this Department's judgment for needs in the area. In general, the required fire-flow is closely related to land use. The quantity of water necessary for fire protection varies with the type of development, life hazard, occupancy, and the degree of fire hazard.

Fire-flow requirements vary from 2,000 gallons per minute (G.P.M.) in low areas to 12,000 G.P.M. in high-density commercial or industrial areas. A minimum residual

water pressure of 20 pounds per square inch (P.S.I.) is to remain in the water system, with the required gallons per minute flowing. The required fire-flow for this project has been set at 9,000 G.P.M. from six fire hydrants flowing simultaneously.

Improvements to the water system in this area may be required to provide 9,000 G.P.M. fire-flow. The cost of improving the water system may be charged to the developer. For more detailed information regarding water main improvements, the developer shall contact the Water Services Section of the Department of Water and Power.

Adequate off-site public and on-site private fire hydrants may be required. Their number and location to be determined after the Fire Department's review of the plot plan.

All water systems and roadways are to be improved to the satisfaction of the Fire Department prior to the issuance of any building permits.

A valid Division 5 Fire Department permit is required prior to installation for all private fire hydrant systems.

Response 6.1:

As discussed in Section IV.K.2, Water, of the Draft EIR, water system improvements are proposed as part of the Harbor Gateway Center project in order to meet increased water demand, including the required fire flow of 9,000 gallons per minute (GPM). The new water system would consist of two main components, one served by the City of Los Angeles Department of Water and Power and the other served by the Dominguez Water Company, both of whom would supply water flows and pressures adequate for domestic and fire water needs. Any additional requirements specified by the Los Angeles Fire Department (LAFD), including the installation of off-site public and on-site private fire hydrants, would also be met. All necessary reviews, approvals and permits would be obtained from the LAFD and other applicable agencies as appropriate.

Comment 6.2:

B. RESPONSE DISTANCE

Based on a required fire-flow of 9,000 G.P.M., the first-due Engine Company should be within one mile, and the first-due Truck Company within one and a half miles.

The Fire Department has existing fire stations at the following locations for initial response into the area of the proposed development:

Fire Station No. 79
18030 S. Vermont Avenue
Gardena, CA 90247
Paramedic Engine Company
Staff - 4
Miles - 1.2

Fire Station No. 85
1331 W. 253rd Street
Harbor City, CA 90710
Task Force and Engine Company
Paramedic Rescue Ambulance
Staff - 12
Miles - 5.0

Fire Station No. 38
124 E. "I" Street
Wilmington, CA 90744
Task Force Truck and Engine Company
Paramedic Rescue Ambulance
Staff - 12
Miles - 4.2

Fire Station No. 64
118 W. 108th Street
Los Angeles, CA 90061
Task Force Truck and Engine Company
Paramedic Rescue Ambulance
EMT Rescue Ambulance
Staff - 14
Miles - 6.4

Fire Station No. 49
400 Yacht Street, Berth 194
Wilmington, CA 90744
Single Engine Company
Boats 3 and 4
Battalion 6 Headquarters
Staff - 13
Miles - 7.3

The above distances were computed to the intersections of West Knox Street and South Normandie Avenue.

Based on this criteria (response distance from existing fire stations), fire protection would be considered inadequate.

In order to mitigate the inadequacy of fire protection in travel distance, sprinkler systems will be required throughout any structure to be built, in accordance with the Los Angeles Municipal Code, Section 57.09.07.

Response 6.2:

Revised maximum response distances to engine and truck companies and distances from existing fire stations computed to the intersection of West Knox Street and South Normandie Avenue are indicated in Corrections and Additions Nos. 6a, 6b and 6c. Information regarding equipment, staffing and response distance for Fire Station Nos. 38 and 49, which were not identified in the Draft EIR as providing initial response to the Harbor Gateway Center site, is also included in Corrections and Additions Nos. 6e. Station 38, not Station 85, would be the designated first-in truck company serving the project site. Consideration of this information does not change the conclusions in the Draft EIR that based on response distances, impacts

would be considered potentially significant and that therefore automatic fire sprinklers would be required in all structures.

Comment 6.3:

C. FIREFIGHTING ACCESS, APPARATUS, AND PERSONNEL

At least two different ingress/egress roads for each area, that will accommodate major fire apparatus and provide for major evacuation during emergency situations shall be required.

Submit plot plans that show the access road and the turning area for Fire Department approval.

Construction of public or private roadway in the proposed development shall not exceed 15 percent in grade.

Private development shall conform to the standard street dimensions shown on Department of Public Works Standard Plan D-22549.

Standard cut-corners will be used on all turns.

During demolition, the Fire Department access will remain clear and unobstructed.

The width of private roadways for general access use and fire lanes shall not be less than 20 feet clear to the sky.

Fire lanes, where required, and dead ending streets shall terminate in a cul-de-sac or other approved turning area. No dead ending street or fire lane shall be greater than 700 feet in length or secondary access shall be required.

All access roads, including fire lanes, shall be maintained in an unobstructed manner, removal of obstructions shall be at the owner's expense. The entrance to all required fire lanes or required private driveways shall be posted with a sign no less than three square feet in area in accordance with Section 57.09.05 of the Los Angeles Municipal Code.

Private roadways for general access use shall have a minimum width of 20 feet.

Where cul-de-sac for a given development requires accommodation of Fire Department apparatus, minimum outside radius of the paved surface shall be 35 feet. An additional six feet of clear space must be maintained beyond the outside radius to a vertical point 13 feet 6 inches above the paved surface of the roadway.

No building or portion of a building shall be constructed more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane.

Where access for a given development requires accommodation of Fire Department apparatus, overhead clearance shall not be less than 14 feet.

Access for Fire Department apparatus and personnel to and into all structures shall be required.

Additional vehicular access may be required by the Fire Department where buildings exceed 28 feet in height.

Where fire apparatus will be driven onto the road level surface of the subterranean parking structure, that structure shall be engineered to withstand a bearing pressure of 8,600 pounds per square foot.

Response 6.3:

Requirements listed above which do not appear as mitigation measures in the Draft EIR have been included in the Corrections and Additions No. 61.

Comment 6.4:

The design, location, and operation of gates shall be to the satisfaction of the Fire Department and the Deputy Advisory Agency. Warning signs and lighting shall be installed and maintained satisfactory to the Fire Department and the Department of Transportation. The names and phone numbers of the current officers of the Homeowners Association shall be submitted to the Fire Department, Police Department, and the Deputy Advisory Agency. All necessary permits shall be secured from the Department of Building and Safety and from other City agencies.

Response 6.4:

A property owners association will be established by the Applicant to provide oversight of common areas. This mitigation measure has been added to the Final EIR (see Corrections and Additions No. 6l).

Comment 6.5:

That in order to provide assurance that the proposed common fire lane and fire protection facilities, for the project, not maintained by the City, are properly and adequately maintained, the subdivider shall record with the County Recorder, prior to the recordation of the final map, a covenant and agreement (Planning Department General Form CP-6770) to assure the following:

A. The establishment of a property owners association which shall cause a yearly inspection to be made by a registered civil engineer of all common fire lanes and fire protection facilities. Any necessary maintenance and corrective measures will be undertaken by the association. Each future property owner shall automatically become a member of the association or organization required above and is automatically subject to a proportionate share of the cost.

B. The future owners of affected lots with common fire lanes and fire protection facilities shall be informed or their responsibility for the maintenance of the devices on their lots. The future owner and all successors will be presented with a copy of the maintenance program for their lot. Any amendment or modification that would defeat the obligation of said association as required hereinabove must be approved in writing by the Advisory Agency after consultation with the Fire Department.

C. In the event that the property owners association fails to maintain the common property and easements as required by the CC and R's, the individual property owners shall be responsible for their proportional share of the maintenance.

D. Prior to any building permits being issued, the applicant shall improve, to the satisfaction of the Fire Department, all common fire lanes and install all private fire hydrants to be required.

E. That the Common Fire Lanes and Fire Protection facilities be shown on the Final Map.

Response 6.5:

These requirements have been added to the Final EIR as mitigation measures (see Corrections and Additions No. 6l) and will be included in the CC&R's developed by the Applicant for the property owners association which will be established for the project subdivision.

Comment 6.6:

That plot plans be approved by the Fire Department showing fire hydrants and access for each phase of the project prior to the recording of the final map for that phase. Each phase shall comply independently with code requirements.

Response 6.6:

This requirement has been added to the Final EIR as a mitigation measure. See Corrections and Additions No. 6l.

Comment 6.7:

CONCLUSION

The Los Angeles Fire Department continually evaluates fire station placement and overall Department services for the entire City, as well as specific areas. The development of this proposed project, along with other approved and planned projects in the immediate area, may result in the need for the following:

1. Increased staffing for existing facilities.

2. Additional fire protection facilities.

3. Relocation of present fire protection facilities.

Project implementation will increase the need for fire protection and emergency medical services in this area.

The inclusion of the above recommendations, along with any additional recommendations made during later reviews of the proposed project, will reduce the impacts to an acceptable level.

Definitive plans and specifications shall be submitted to this Department and requirements for necessary permits satisfied prior to commencement of any portion of this project.

For additional information, please contact the Construction Services Unit at (213) 485-5964.

Response 6.10:

This comment reiterates data presented in Section IV.I.1, Fire Protection, of the Draft EIR and therefore does not require a response.

COMMENT No. 7:

March 19, 1997

Robert B. Hansohn, Captain
Area Commanding Officer
Harbor Community Police Station
Los Angeles Police Department
P.O. Box 30158
Los Angeles, CA 90030

EIR 96-0090-SUB (ZV)(CUB)(DA)

Comment 7.1:

I have recently reviewed the EIR for the proposed Harbor Gateway Center. The project is located within the area over which I have command responsibility. Let me first state that I believe the project is very important to our community and the location where it will be located is in dire need of revitalization.

However, I have some concerns with information contained in the EIR for this project. Increasing the population of this segment of the community by approximately 6000 people will have a significant negative impact on law enforcement. The recommended mitigation measures listed on page 251 and 252 will not, in my opinion, significantly reduce this impact. Therefore, I would also disagree with the conclusion on page 253.

The irregular shape of Harbor Area does have an impact on how well we can respond to calls for police service, particularly in the Harbor Gateway. A meaningful alternative to deal with this project's significant impact on my resources would be to establish a satellite police station within the Harbor Gateway Center. In so doing, some officers would be deployed directly from that facility rather than Harbor Area station which is located a considerable distance away from the proposed site. A cooperative effort between the City and the developer could make this suggestion become a reality. Naturally, the Chief of Police would have to approve this concept.

Again, let me emphasize my support for this project. Community members have already approached me saying how pleased they are with the proposal. Even though the impact on law

enforcement will be significant, I believe these concerns can be overcome. If you have any questions or concerns, please feel free to contact me at (310) 548-7601.

Response 7.1:

This comment will be forwarded to the decision-makers. The commentator's assessment regarding the significance of the project impacts examined in Section IV.I.2, Police Protection, of the Draft EIR is acknowledged. The net increase in daytime population of 5,870 to 6,170 persons resulting from buildout of the proposed project and the potentially significant impacts on police service associated with such daytime population levels are discussed in this section. Mitigation measures, including the provision of private on-site security within the retail portion of the project, are included within the Draft EIR. It is also expected that future projects within the office/industrial park portion of the project will provide private security measures and personnel adequate to meet the needs of individual facilities, although these needs cannot be precisely known until individual development projects within the office/industrial park component of the project are proposed. As noted in the Draft EIR, these measures will work to minimize the demand for additional LAPD service. In addition, as requested in the comment, the project Applicant shall coordinate with the Los Angeles Police Department regarding the feasibility of, and requirements for, the establishment of a "satellite" police station within the Harbor Gateway Center. The exact nature, size, capacity (i.e., number of officers, vehicles, etc.) and function (i.e., 24-hour manning, walk-up service facilities, etc.) of this facility have not been identified by LAPD. Depending upon the actual facilities provided at this satellite station and the number of officers which would be deployed directly from the satellite station rather than from the Harbor Area station, it may provide capacity to serve a greater need than just the demand associated with the Harbor Gateway Center. Thus, the suggested satellite police station should be more appropriately viewed as a new facility which enhances the capability of the LAPD to serve the entire Harbor Gateway community, rather than as a mitigation measure for the proposed Harbor Gateway Center.

COMMENT No. 8:

March 24, 1997

Joan Friedman
Environmental Review Unit
Los Angeles Unified School District
Facilities Services Division
365 South Grand Avenue, Suite 500
Los Angeles, CA 90072 [illegible]

Re: Harbor Gateway Center

Comment 8.1:

Thank you for the opportunity to the [sic] review the Environmental Impact Report for the above-referenced project.

Attachment A has been prepared by the District's Environmental Health and Safety Branch staff. It discusses the impact that project construction will have on air quality at One Hundred Eighty-sixth Street School.

If we can provide any additional information please contact me at (213) 633-8986.

Response 8.1:

The principal response to the issues raised by the School District is contained in Response 8.2. No further response to this comment is necessary.

ATTACHMENT A

TO: Joan Friedman, Realty Agent
Real Estate and Asset Management Branch

Date
March 18, 1997

FROM: Bill Piazza
Environmental Health and Safety Branch

SUBJECT: Harbor Gateway Center: DEIR

Comment 8.2:

In response to your request to provide comments on the air quality element for the above referenced project, the following is provided.

Upon review of the available documentation presented in the Draft Environmental Impact Report (DEIR) staff notes that the applicant readily proclaims that average daily PM10 emissions associated with construction activities would produce "significant air quality impacts." Specifically referenced is the affect [sic] the project may have on our local school. As such, the applicant states that sensitive receptor locations in proximity of the proposed project (e.g., 186th Street School) could experience "increased dust levels" from site grading activities that "would constitute a significant air quality impact."

However, with the admission of the project's impact on local air quality, the applicant can only present a list of mitigation measures to "lessen the project's significant air quality impacts." Yet, with implementation of these mitigation measures, project related emissions are reported to remain "significant and unavoidable."

Although the applicant admits significant impacts will occur during site development, nothing is offered to mitigate these impacts on our local school based population. It is alarming that the applicant offers no mitigation measures to minimize the degradation of local air quality and subsequent exposures to our students and staff. To underscore our concern, the California Air Resources Board reports that when inhaled, particulates expose children to adverse health effects such as "increased asthma attacks, reduced pulmonary function and increased risk of respiratory illnesses." In a recent staff paper prepared by the Environmental Protection Agency (U.S. EPA 1996), it was reported that short-term particulate exposures increased the likelihood of school absences due to altered lung function and increased respiratory tract irritation.

As a result, particulate emissions generated from construction activities are considered unacceptable and necessitate appropriate mitigation for students and staff who work and/or attend class at 186th Street School. The applicant, therefore, must effectively reduce particulate concentrations and minimize contaminant infiltration within occupied building structures. Staff recommends that the applicant implement the following offsite control measures to reduce project related impacts to a level of insignificance.

Offsite controls shall mean the installation of local air purification systems which exhibit a control efficiency of not less than 95 percent for particulates ($\leq$ 10 microns). Additionally, outdoor ancillary structures used by students and staff during lunch and recess (i.e., tables and benches) shall receive periodic cleaning to minimize particulate deposition and subsequent reentrainment.

Please advise as to the disposition of this memorandum and subsequent response by the applicant. I can be reached at (213) 743-5086 should you have any questions or need additional information.

Response 8.2:

The District's recommendation that the proposed project provide mitigation in the form of off-site controls, such as installation of local air purification systems and the cleaning of outdoor school equipment, is not considered to be feasible or appropriate given the nature and extent of the potential impact. The Draft EIR's identification of potential significant impacts from PM_{10} emissions relate only to short-term construction-related activities. The PM_{10} emissions presented in Table 12 on page 110 of the Draft EIR are based on very conservative assumptions. These include the assumption that the greatest construction-related emissions would occur with the development of Area 1 and all of the subject area would be graded within a one-month period. As such, the total PM_{10} emissions, which exceed the SCAQMD daily threshold of significance, as shown in Table 12 would occur for only one month. Moreover, the 186th Street Elementary School is located approximately 1,900 feet north of the project site and the San Diego Freeway, which is elevated and acts as a barrier to fugitive dust, is located between the project site and 186th Street Elementary School. Further, vehicles travelling on the San Diego Freeway would create an over-road wind channel operating in a perpendicular direction to winds that would transport PM_{10} from the project site to the 186th Street School. The long-term PM_{10} emissions related to project operations are well below the threshold of significance as shown in Table 13 on page 112 of the Draft EIR. Therefore, the most appropriate mitigation for PM_{10} emissions generated during project construction are the on-site dust control measures presented on pages 121 and 122 of the Draft EIR.

COMMENT No. 9:

March 20, 1997

Jodean M. Giese
Supervisor of Environmental Assessment Business Team
Department of Water and Power
The City of Los Angeles
111 North Hope Street
Los Angeles, CA 90051-0100

Comments on Draft Environmental Impact Report (DEIR) for
the Harbor Gateway Center (Project)

Comment 9.1:

The Los Angeles Department of Water and Power (LADWP) welcomes the opportunity to comment on Project DEIR as requested on February 6, 1997.

LADWP's Energy Services Organization provides the following discussion for your consideration:

Electrical service will be provided in accordance with LADWP's rules and regulations. Facility construction may cause limited temporary impacts on the surrounding communities in the form of unavoidable noise, air pollution, and traffic congestion during construction.

LADWP's Energy Distribution Business Unit estimates the increase in demand due to this Project will have no adverse impact on the distribution system. However, the cumulative effects of this and other projects in the area may require LADWP to construct additional distribution facilities in the future. The Project will likely be supplied from LADWP's 34.5-kV distribution system with transformation to the Project's utilization voltage taking place at the project site.

Response 9.1:

This comment reiterates data presented in Section IV.J.1, Electric Power, of the Draft EIR. No response is necessary.

Comment 9.2:

LADWP's Water Services Organization provides the following comments:

Based on the estimated water demand of 269.4 million gallons per year as stated in the DEIR, this site can be supplied with municipal water by LADWP.

Currently the site is supplied by a 16-inch water line located on Normandie Avenue approximately 100 feet north of Knox Street. Figure 30 on page 271 of the DEIR shows the proposed water main to be installed within the site. This proposed water main will be connected to a 31-inch water main in Normandie Avenue and a 12-inch water main in West 190th Street. These two water mains are in two different pressure systems, so proper pressure regulation will be required to serve this area from these two locations.

The adequacy of LADWP's water mains to supply public fire protection can only be determined after the Fire Hydrant Unit of the City of Los Angeles Fire Department determines the future demand.

If you have any questions regarding the aforementioned comments or power service related issues, please contact me at (213) 367-0409.

Response 9.2:

The majority of this comment reiterates data presented in Section IV.K.2, Water, of the Draft EIR. Therefore, no response is necessary. Information regarding implementation of a pressure regulation system is included in Corrections and Additions No. 7c.

COMMENT No. 10:

January 16, 1997

To: Darryl L. Fisher, Deputy Advisory Agency
Department of City Planning

From: Robert Takasaki, Senior Transportation Engineer
Department of Transportation

Subject: TRAFFIC IMPACT ANALYSIS OF PROPOSED HARBOR GATEWAY CENTER MASTER PLAN DEIR ALTERNATIVES

Comment 10.1:

The Los Angeles Department of Transportation (LADOT) has reviewed the traffic impact analysis of the proposed Harbor Gateway Center Master Plan DEIR alternatives prepared by Crain and Associates dated January 7, 1997. This analysis adequately describes the relative traffic impacts of the alternatives and is suitable for inclusion within the Alternatives Section of the DEIR.

However it should be noted that this analysis does not identify which mitigation measures are appropriate for each alternative. Before any of the alternative projects can be adopted, a supplemental analysis of that alternative project will be required. This supplemental analysis will need to be at the same level of detail as the project traffic study and would be used to develop appropriate conditions of approval. The supplemental analysis, however, is not necessary until such time as one of the alternative projects is being considered for adoption.

Response 10.1:

The traffic impact analysis of alternatives referred to in the comment was incorporated into the analysis presented for each alternative in Section VIII of the Draft EIR. The Draft EIR notes, on page 343, that in the event one of the alternatives is selected for development in lieu of the proposed project, a detailed traffic analysis, which would identify the mitigation measures that would be pertinent to that alternative, would need to be prepared and approved by the City's Department of Transportation. The changes to the proposed project (see Comment 15.1) would not cause any departure from the findings of the traffic analysis prepared for the project.

Therefore, the traffic mitigation measures identified for the proposed project would remain valid (see also Response 15.1).

COMMENT No. 11:

March 10, 1997

TO: Hadar Plafkin
Project Coordinator

FROM: Jack Sedwick, Principal City Planner
Community Planning Bureau

SUBJECT: REVIEW OF DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE HARBOR GATEWAY CENTER (1414 W. 190TH STREET BETWEEN WESTERN AND NORMANDIE AVENUES)
NO. 96-0090-SUB(ZV)(CUB)(DA); SCH. NO. 96051050, TT 52172

Comment 11.1:

The following are our comments on the DEIR for the HARBOR GATEWAY CENTER in response to your request.

Project Description

The McDonnell Douglas Realty Company proposes to demolish approximately 2.4 million square feet of industrial/warehouse facilities and construct an approximately 3-million square-foot retail, office, and industrial park development on a 170-acre site located on the south side of 190th Street, between Normandie and Western Avenues. Area 1, which occupies the northernmost 40 acres of the site, is to be developed with 450,000 square feet of retail uses, including about 355,000 square feet of large scale retailers, a maximum 65,000 square foot (4,000 seat) movie theater complex, and up to 30,000 square feet of restaurants. Area 2, which occupies the remainder of the site, is to be developed with about 500,000 square feet of office uses and 2 million square feet of industrial park uses.

Relationship to General Plan

The site is located within the Harbor Gateway Community Plan area, which was updated under the Community Plan Update (CPU) program, adopted by the City Council on January 26, 1996.

The Plan Land Use designation for the subject site is "Heavy Industrial" with corresponding zones of M3 and P. The proposed project includes uses which can be classified as both commercial and industrial, both of which are permitted under the plan designated land use category and zoning for the site. The prevailing land use pattern established in the vicinity is office and light industrial use, with limited commercial development.

The Community Plan Update, adopted by the City Council on January 26, 1996, revised the Community Plan Footnote No. 5 to read:

> "Industrial areas not within specific plan study area boundaries or the area bounded by San Diego Freeway to the north, Del Amo Boulevard to the south, Western Avenue to the west, and the Harbor Freeway to the east, are intended to be limited to Height District 1VL."

The project site, which is located within the above-mentioned area, is therefore exempt from the height restrictions of 1VL applicable to most other industrial areas in the community plan area.

Response 11.1:

This comment reiterates data presented in Section IV.G, Land Use, of the Draft EIR, and therefore, does not require a response.

Comment 11.2:

The COMMUNITY BACKGROUND discussion in Chapter 1 of the Community Plan identifies the project proposed for this site.

Response 11.2:

As discussed in Section IV.G, Land Use, of the Draft EIR, the project is consistent with the applicable provisions of the Harbor Gateway District Plan. No further response is necessary.

Comment 11.3:

The Plan's COMMUNITY ISSUES AND OPPORTUNITIES section in Chapter 1 includes the *Issue* of "intrusion of commercial uses into industrially planned areas." *As Opportunities* are listed "emergence of new commercial areas on industrially zoned sites" and "availability of

large sites for reuse or development which are planned for job producing uses that improve the economic and physical conditions of the area."

Response 11.3:

As described in Section II, Project Description of the Draft EIR, the project does include some commercial uses, however, most of the site area is set aside for industrial uses. As discussed in Section IV.G, Land Use of the Draft EIR, the majority of the site is planned for employment-generating office/industrial park uses and therefore would help fulfill the opportunity to reuse an existing industrial site by implementing new job-producing land uses. Further, the proposed retail uses would provide up to between 1,000 and 1,100 jobs which are anticipated to be filled largely by area residents.

Comment 11.4:

Chapter III - LAND USE POLICIES AND PROGRAMS of the updated Harbor Gateway Community Plan states in part that "the Harbor Gateway Center in the vicinity of the Harbor and San Diego Freeways junction has been designated as a center for commercial and industrial growth." The Community Plan and General Plan Framework both recognize the potential for this area to become an important center.

Response 11.4:

As discussed in Section IV.G, Land Use of the Draft EIR, the proposed retail and office uses are among the uses specifically encouraged within Regional Centers. As the project is designed as an employment generating commercial and industrial center, it is consistent with both the Community Plan and General Plan Framework.

Comment 11.5:

The DEIR is accurate in its statements that development on the site may create compatibility conflicts with the adjacent residential uses to the south, that the project will result in significant traffic impacts on area roads and freeways, and that the two proposed 120-foot tall pole-mounted signs represent a substantial departure from City of Los Angeles sign regulations, which specify a maximum height of 42 feet. Staff recommends that site plan review or other discretionary review consider requiring mitigation measures to minimize compatibility impacts to the adjacent residences to the south, and signage more appropriate in size to the proposed scale of buildings on that portion of the site.

Response 11.5:

With respect to visual compatibility as perceived from adjacent residences to the south, including the proposed 120-foot tall pole signs, urban design standards, proposed to regulate development of the entire site, have been incorporated as part of the project to ensure an appropriate aesthetic appearance. Section II.D, Project Characteristics of the Draft EIR, contains a full discussion of proposed design standards for the site. As discussed in Section IV.M, Aesthetics of the Draft EIR, the proposed development is consistent with applicable General Plan Framework Policies regarding regional centers, associated visual amenities and pedestrian accommodations. In order to minimize potential visual impacts upon 203rd Street residences to the south, additional on-site visual buffers and landscape screening treatments will be provided. The landscape setbacks will serve to visually integrate the different uses on-site and enhance the appearance of the development from surrounding streets and neighborhoods. Accordingly the proposed development represents substantial aesthetic improvements, with increased sensitivity to, and integration with, surrounding land uses. The proposed project height and bulk standards are compatible with existing development and no significant aesthetic impact is anticipated. Proposed Area 1 development includes two 120-foot tall pole-mounted signs for purposes of project and major tenant identity, located on the northernmost portion of the project site, furthest from the residences to the south. Although these signs would be otherwise compatible with the projects's architectural and design standards and the City's signage requirements, the height of the signs represents a substantial departure from the maximum height of 42 feet specified by the City of Los Angeles sign regulations. However, the proposed height of the signs represents the sole modification to the sign regulations which will be requested and would be subject to approval by the Department of Transportation and the Department of Building and Safety. If approvals are granted, in accordance with the requirements and procedures of the City of Los Angeles, the signs would, by definition, be in conformance with sign regulations and therefore no significant impact would be anticipated. Without such approvals, the two 120-foot signs could not be constructed.

With respect to compatibility conflicts with the adjacent residential uses to the south, as discussed in Section IV.E, Noise of the Draft EIR, to ensure that any noise generated by the industrial park uses does not adversely affect adjacent residential receptors, the development plan for the project includes a sound wall a minimum of eight feet in height along the boundary between the project site and residential properties. This wall would reduce noise from on-site activities by up to about 9 dBA on the ground floor of the nearest residential properties, thereby minimizing the effect of noise from the project site. Such a wall would also comply with City of Los Angeles requirements for screening walls between office/industrial park and residential uses. Consequently, on-site operations are not anticipated to violate the City Noise Ordinance

or create any significant noise compatibility impact to the residential uses south of the project site.

Since the proposed project is not subject to site plan review, these measures will be incorporated within the Conditions of Approval established for the project's subdivision action. In compliance with Section 21081(a) of the Public Resources Code, findings must be adopted by the decision-maker coincident with certification of the EIR. In accordance with requirements of Sections 21081(a) and 21081.6 of the Public Resources Code, in addition to the required mitigation measures/conditions, an accountable enforcement agency and monitoring agency shall be identified for mitigation measures/conditions adopted as part of the decision-maker's final determination.

Comment 11.6:

In addition, staff recommends that the analysis of environmental impacts of this project also consider the cumulative effect of its completion in conjunction with the anticipated development of the HARBOR GATEWAY RETAIL CENTER, an approximately 810,000 square-foot retail shopping complex proposed on the 67.43-acre Lockheed Martin Corporation site directly adjoining the subject property to the north and west.

Response 11.6:

As shown on page 86 of Section III.B, Related Projects of the Draft EIR, the Harbor Gateway Retail Center, is included as related project LA33. As such this project was included as a project used to assess the cumulative effects associated with development throughout the project area.

COMMENT No. 12:

March 21, 1997

To: Mr. Con Howe, Director
Department of City Planning
Attention: Hadar Plafkin

From: Glenn Hirano, Assistant Division Engineer
Development Services Division (Land Development)
Bureau of Engineering

Subject: Request for Comments - Draft Environmental Impact Report
"Harbor Gateway Center", EIR 96-0090-SUB(ZV)(CUB)(DA)

Comment 12.1:

This office has previously submitted comments on June 18, 1996, and has the additional following comments:

MITIGATION MEASURES: Mitigation measures are measures which go above and beyond requirements mandated by law or current regulation. The requirements themselves should not be listed as mitigation measures.

Response 12.1:

The comment is acknowledged and will be forwarded to the decision-makers for consideration. The mitigation measures for the project presented in the Draft EIR do include some measures required by law or regulation. Inclusion of these measures was considered appropriate in order to ensure their inclusion in the conditions of approval and mitigation monitoring program for the project.

Comment 12.2:

SOLID WASTE: A coordinated program should be developed to assist tenants in the recycling of materials generated during operation of retail establishments. Please contact Kelly Ingalis of the Integrated Solid Waste Management Office at (213) 237-0143 for assistance.

Response 12.2:

The comment is acknowledged and will be forwarded to the decision-makers for consideration. The Draft EIR includes mitigation measures for recycling of demolition and construction debris and use of recycled building materials during construction, the only phase of project development over which the project Applicant may exert control. Current demolition activity on the site has incorporated procedures for the recovery and recycling of all materials which can be feasibly recycled. However, the Applicant will include a provision in the CC&R's developed for the property owners association which is to be established for the project which requires that property owners coordinate with the City's Integrated Solid Waste Management Office and make all reasonable efforts to comply with the City's recommendations with respect to the establishment of recycling programs during project operations.

Comment 12.3:

GEOTECHNICAL REVIEW: The Draft EIR is acceptable from a geotechnical viewpoint.

Response 12.3:

The comment is acknowledged and will be forwarded to the decision-makers. No additional response is necessary.

Comment 12.4:

TRANSPORTATION/CIRCULATION: The Draft EIR under Sections II.D.2.a and IV. H.2d, indicated the approval of two new railroad crossings in conjunction with proposed "C" Street and a proposed driveway from the California Public Utilities Commission (PUC) will be required. The final EIR should describe in detail who is responsible for obtaining this approval. Since the proposed crossing will primarily serve this project alone, it is unlikely that the Bureau of Engineering will process the application to the PUC.

If you have any questions, please contact Mr. Ray Saidi at telephone (213) 485-3091.

Response 12.4:

The California Public Utilities Commission requires that only a public agency or a railroad may apply for a railroad crossing. The Applicant is presently working with the Department of Transportation, Franchise Regulation Division, in preparing the application to the PUC.

COMMENT No. 13:

February 26, 1997

Barbara Kilroy
Department of Building and Planning
205 South Willowbrook Avenue
Compton, CA 90020

RE: COMMENTS ON DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR) FOR HARBOR GATEWAY CENTER (SCH No. 96051050, TT 52172)

Comment 13.1:

The City's Traffic Engineer has reviewed the traffic study for the Harbor Gateway Project proposed for 1414 W. 190th Street, in the City of Los Angeles and offers the following comments:

1. Table 10 of the traffic study (page 43) shows an increase on west bound SR 91 traffic in the year 2006 of 252 vehicles east of Alameda Street during the AM peak hour over traffic without the project. This does not coincide with the LOS calculations in Table 11 (page 44) which show that future freeway traffic conditions will likely be similar with or without the project.

Response 13.1:

The commentor is correct in noting that Table 11 on page 44 of the project traffic study reflects that conditions will be at level of service (LOS) F(2) with or without the project. However, the demand-to-capacity ratios do show that a significant impact (i.e., an increase of greater than 2 percent at an LOS F location) would occur. Thus, the impacts of the project are accurately reflected in Table 11.

Comment 13.2:

2. The City would like to see the developers of this project encourage Caltrans to add capacity to the 91 freeway in the future to handle both natural increases in traffic and those related to projects such as the Harbor Gateway development.

Thank you very much for giving us the opportunity to review the DEIR for the Harbor Gateway Project.

Response 13.2:

This comment is acknowledged and will be forwarded to the decision-makers. Caltrans and MTA were provided with copies of the Draft EIR which indicates the forecast cumulative impacts to the State Route 91 freeway segments. These results, combined with other similar forecasts (e.g., the analyses for the CMP), should encourage these agencies to implement demand reduction and capacity enhancement measures.

COMMENT No. 14:

March 18, 1997

Kathy T. Ikari
Community Development Director
City of Gardena
1700 West 162nd Street
Gardena, CA 90247-3778

Subject: Harbor Gateway Center Draft EIR - State Clearinghouse No. 96051050
1414 West 190 Street - between Western and Normandie Avenues

Comment 14.1:

The City of Gardena appreciates the opportunity to comment on the draft EIR for the above referenced project. It is our opinion that when developed this project will have significant potential impacts on our city streets and residential neighborhoods south of Artesia Blvd. both project specific and cumulative which are not addressed in the Draft EIR.

Specifically, the related projects upon which the traffic analysis is based does not recognize a significant project within your own city boundaries, the Artesia Transit Center and Park and Ride. With a capacity of 1200 parking spaces and an exclusive busway and van and carpool entrance from 182nd Street, the transit center will greatly contribute to peak hour traffic on 182nd Street and Vermont Avenue, Vermont Avenue and Artesia Blvd, and Normandie Avenue and 182nd Street. When you consider the projected peak hour level of service for both Artesia Blvd. and 190th Street it would appear that use of alterative east/west streets such as 182nd Street which is signalized at both Vermont and Normandie Avenues would greatly increase. The EIR acknowledges impacts on the intersection of Vermont Avenue and Artesia Blvd. and proposes mitigation measures northbound at Vermont Avenue and Artesia Blvd. which leads us to conclude that there will be significant traffic movement northbound in the vicinity of 182nd Street. We therefore request that the conditions created by the transit center be factored in and that traffic calming measures be instituted to mitigate potential peak hour mobile source air pollution, traffic and noise impacts on 182nd Street between Normandie and Vermont Avenues.

Please feel free to contact me at (310) 217-9526 should you have any questions.

Response 14.1:

The Artesia Transit Center and Park and Ride lot are intended to reduce traffic congestion. These facilities will make transit a more attractive travel mode and thereby increase transit usage within the project area. This will result in decreased traffic congestion on area freeways and surface streets. To be conservative, however, the benefits of these facilities in reducing traffic congestion were not taken into account in the traffic study. This includes the assessment, provided in Response 2.2 above, that the CMP credits of the project will total over four times the CMP debits. The project is located approximately one-half mile south of 182nd Street and is not expected to contribute substantial traffic in the vicinity of the Artesia Transit Center. All project traffic impacts north of the freeway, including 182nd Street, would be reduced to less than a level of significance by the proposed mitigation measures. Therefore, the project, with mitigation, would not significantly contribute to any cumulative impacts in this area.

COMMENT No. 15:

March 24, 1997

Dale Neal
LATHAM & WATKINS
(representing the Project Applicant)
633 West Fifth Street, Suite 4000
Los Angeles, CA 90071-2007

Re: Comments on Harbor Gateway Center Draft EIR (EAF Case No: 96-0090-SUB(ZV)(CUB)(DA))

Comment 15.1:

On behalf of our client, McDonnell Douglas Realty Company, the Applicant for the Harbor Gateway Center project (the "Project"), we are pleased to provide the following comments on the Draft Environmental Impact Report (DEIR) for the Project.

In general, we feel that the DEIR is thorough, well written, and responsive to the requirements of the California Environmental Quality Act (CEQA). Our only comments on the document pertain to the need to update the DEIR's Project Description to reflect recent refinements in, and clarifications to, the proposed Project. As discussed below, the Project's refinements and clarifications described herein do not change the overall analysis and conclusions of the DEIR; but, rather, serve to provide a more current reflection of the proposal as it continues to be refined through project planning and engineering. Our comments regarding the Project Description are as follows:

> **Refinements to the Proposed Tentative Tract Map** Attached is a copy of the draft Vesting Tentative Tract Map (TTM) to be submitted for the Project. The proposed TTM was recently updated to reflect refinements in the conceptual roadway system and lot configurations, and will be submitted to the City as a modification to the TTM Application. These refinements to the Project do not constitute a significant change under CEQA. The following summarizes the recent refinements to the TTM:
>
> **1. Circulation System** - The most notable revision in the plan involves the proposed alignment of A Street. A Street was originally proposed to align along the northwest boundary of the site to offer shared access with the adjacent property, but the owner of

such property has expressed no interest in such shared access. Therefore, the proposed alignment of A Street is shifted easterly to enable its northern terminus to align with the existing traffic signal at Denker Avenue on West 190th Street, thereby avoiding the need to relocate that signal. The northern portion of A Street, between C Street and West 190th Street, would be improved as a private easement. These differences related to A Street can be seen in comparing the attached draft TTM with Figure 10 -- Internal Circulation System of the DEIR. A revised Figure 10 should be included in the Final EIR.

Related to the realignment of A Street is a refinement to the plans for C Street. Its western terminus will occur as a cul-de-sac to facilitate the future extension of 195th Street from Western Avenue to Normandie Avenue as shown on the conceptual Alternative 2 plan (Master Planned Block Development) in the DEIR (i.e., the cul-de-sac would be removed to provide a through way). If this extension of 195th Street occurs, the northern segment of A Street, between C Street and West 190th Street, may be terminated. The proposed intersection of A Street and West 190th Street would remain to provide controlled access to/from the retail portion of the Project.

These refinements to the proposed circulation system do not constitute a significant change under CEQA, and do not alter the overall analysis and conclusions of the DEIR. The essence of the Project, as addressed in the DEIR, remains unchanged.

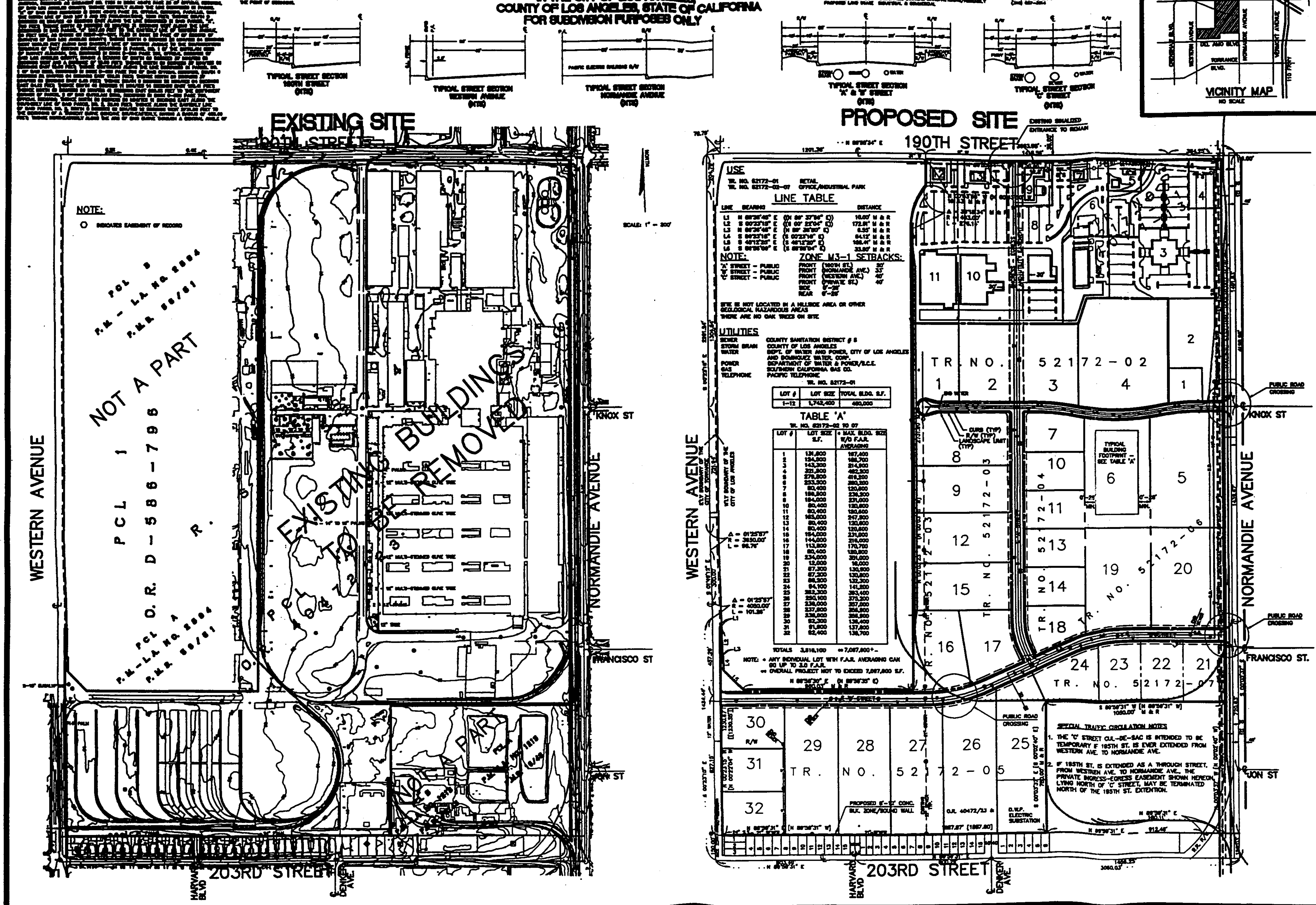
2. Retail Area Configuration - The easterly portion of the proposed retail center has been extended south to C Street. The total retail building retail floor area potentially would still not exceed the 450,000 square feet assumed for the impacts analysis of the DEIR. As such, this Project refinement would not alter the overall analysis and conclusions of the DEIR.

Clarification Regarding Public Road Crossing of Existing Rail Lines - In addition to the proposed development of two new rail crossings, as shown in Figure 10 of the DEIR, approval of a public road crossing by the California Public Utilities Commission (PUC) will be sought for the existing crossing (shown in Figure 2 of the DEIR) on B Street just west of that Street's intersection with A Street. Such crossing is depicted on Figure 10, but needs to be appropriately labeled in the Final EIR.

We appreciate the opportunity to comment on the DEIR and look forward to the City's ongoing progress in the processing of the Project. Should you have any questions, please contact me at (213) 891-7930.

DRAFT VESTING TENTATIVE TRACT NO. 52172

IN THE CITY OF LOS ANGELES,
COUNTY OF LOS ANGELES, STATE OF CALIFORNIA
FOR SUBDIVISION PURPOSES ONLY



USE

TR. NO. 52172-01 RETAIL
TR. NO. 52172-02-07 OFFICE/INDUSTRIAL PARK

LINE TABLE

LINE	BEARING		DISTANCE
L1	N 89°36'45" E	(N 89° 37'04" E)	10.00' M & R
L2	S 00°23'15" E	((S 00° 22'04" E))	172.81' M & R
L3	N 89°36'45" E	(N 89° 36'50" E)	6.55' M & R
L4	S 00°23'15" E	(S 00°23'10" E)	64.12' M & R
L5	S 45°12'25" E	(S 45°12'20" E)	168.41' M & R
L6	S 89°36'00" E	(S 89°36'04" E)	33.80' M & R

NOTE:

'A' STREET - PUBLIC
'B' STREET - PUBLIC
'C' STREET - PUBLIC

ZONE M3-1 SETBACKS:

FRONT	(190TH ST.)	30'
FRONT	(NORMANDIE AVE.)	35'
FRONT	(WESTERN AVE.)	40'
FRONT	(PRIVATE ST.)	40'
SIDE	0'-25'	
REAR	0'-25'	

SITE IS NOT LOCATED IN A HILLSIDE AREA OR OTHER GEOLOGICAL HAZARDOUS AREAS
THERE ARE NO OAK TREES ON SITE

UTILITIES

SEWER	COUNTY SANITATION DISTRICT # 5
STORM DRAIN	COUNTY OF LOS ANGELES
WATER	DEPT. OF WATER AND POWER, CITY OF LOS ANGELES AND DOMINGUEZ WATER CORP.
POWER	DEPARTMENT OF WATER & POWER/S.C.E.
GAS	SOUTHERN CALIFORNIA GAS CO.
TELEPHONE	PACIFIC TELEPHONE

TR. NO. 52172-01

LOT #	LOT SIZE	TOTAL BLDG. S.F.
1-12	1,742,400	460,000

TABLE 'A'

TR. NO. 52172-02 TO 07

LOT #	LOT SIZE S.F.	* MAX. BLDG. SIZE W/O F.A.R. AVERAGING
1	131,600	197,400
2	124,500	186,700
3	143,300	214,900
4	321,500	482,300
5	279,800	419,200
6	253,500	380,200
7	80,400	120,600
8	158,500	238,200
9	154,000	231,000
10	80,400	120,600
11	80,400	120,600
12	165,000	247,500
13	80,400	120,600
14	80,400	120,600
15	154,000	231,000
16	144,000	216,000
17	113,800	170,700
18	80,400	120,600
19	234,000	351,000
20	12,000	18,000
21	87,300	130,900
22	87,200	130,800
23	88,200	132,300
24	94,100	141,200
25	262,300	393,400
26	250,100	375,200
27	238,000	357,000
28	237,900	356,900
29	236,000	356,900
30	92,300	138,400
31	91,800	137,800
32	92,400	138,700
TOTALS	3,816,100	** 7,067,800 +-

NOTE: * ANY INDIVIDUAL LOT WITH F.A.R. AVERAGING CAN GO UP TO 3.0 F.A.R.
** OVERALL PROJECT NOT TO EXCEED 7,067,800 S.F.

SPECIAL TRAFFIC CIRCULATION NOTES

1. THE 'C' STREET CUL-DE-SAC IS INTENDED TO BE TEMPORARY IF 195TH ST. IS EVER EXTENDED FROM WESTERN AVE. TO NORMANDIE AVE.
2. IF 195TH ST. IS EXTENDED AS A THROUGH STREET, FROM WESTREN AVE. TO NORMANDIE AVE., THE PRIVATE INGRESS-EGRESS EASEMENT SHOWN HEREON LYING NORTH OF 'C' STREET, MAY BE TERMINATED NORTH OF THE 195TH ST. EXTENTION.

1 REV. LOTS AND STREETS

TAIT & ASSOCIATES INC.
1100 TOWN & COUNTRY ROAD SUITE 1200, P.O. Box 4429, Orange, California 92868
(714) 560-8200
(714) 560-8211 FAX

TITLE: VESTING TENTATIVE TRACT NO. 52172
McDONNELL DOUGLAS REALTY CO.
4060 LAKEWOOD BLVD., 6TH FLOOR
LONG BEACH, CA 90808-1700
PROJECT: HARBOR GATEWAY
LOS ANGELES, CA

DRAWN: M.A.C.
DATE: 3/5/96
CHECKED: G.S.S.
DATE: 3/5/96
REVISION # 5
DATE: 4/24/96
JOB NO. SP3208

1 OF 1

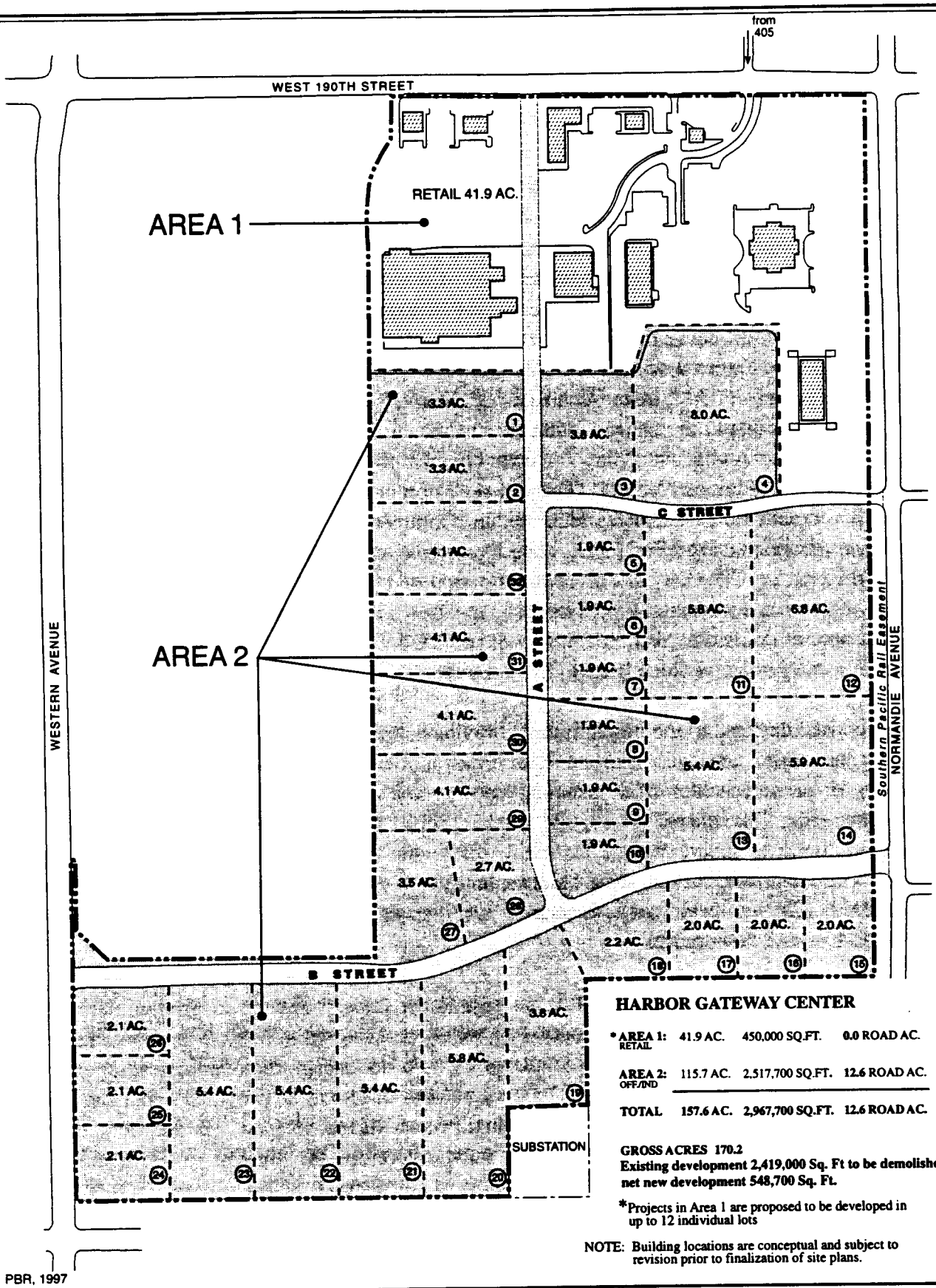
BOE-C6-0113618

Response 15.1:

The changes to the project's proposed vesting tentative tract map provided by the project Applicant are acknowledged and have been incorporated into the EIR where appropriate. Subsequent to the submission of the comment letter, additional coordination with LADOT by the Applicant resulted in further modifications to the proposed project site plan beyond those identified in the comment letter. These changes include the provision of a permanent direct roadway connection between 190th Street and the office/industrial park area, replacing the proposed ingress-egress roadway and utility easement and removal of the cul-de-sac extension of "C" Street west of "A" Street, such that "C" Street is now proposed to end at "A" Street. These modifications to the changes indicated in the comment letter have been reflected in the Final EIR. The revised site plan is shown on the following page and is also included in Corrections and Additions No. 1j. The full set of proposed changes to the project's tract map (i.e., the combination of changes identified in Comment 15.1 and subsequent modifications) have been included in the Final EIR. See Corrections and Additions Nos. 1a, 1e through 1h and 1j through 1u. The City has reviewed the proposed changes (the "revised project") relative to the analysis and conclusions provided in the Draft EIR to ensure that no new significant information, as defined in Section 15088.5 of the CEQA Guidelines, would be generated by the changes in the project as identified in the comment.

The proposed changes in the project include revisions in the proposed internal roadway system serving the project, changes in lot configurations and the proposed upgrading to a public road crossing of the intersection of an existing roadway and a railroad line at a location internal to the project site. The overall size of the revised project, in terms of site acreage as well as the maximum buildout square footage for retail, office and industrial park uses, would remain the same. The potential effects of these changes on each of the environmental issue areas examined in the Draft EIR was examined to determine whether any changes in the conclusions presented in the EIR would be required.

Earth - The Draft EIR concludes that no significant impacts related to grading, erosion or seismic hazards (groundshaking, liquefaction) would be expected to result from implementation of the proposed project. The proposed changes would not change the overall grading amounts expected to occur under the project. The total number of lots to be provided under the revised project (up to 44 lots) is similar to the original project (up to 45 lots). In addition, the total buildout for the project would remain the same, therefore the amount of earth movement (approximately 473,000 cubic yards) and import of fill material (approximately 420,000 cubic yards) to provide building pads for project structures would be similar to the volumes indicated in the Draft EIR. With the same amount of new construction on the same site, conditions



HARBOR GATEWAY CENTER

*AREA 1: RETAIL	41.9 AC.	450,000 SQ.FT.	0.0 ROAD AC.
AREA 2: OFF/IND	115.7 AC.	2,517,700 SQ.FT.	12.6 ROAD AC.
TOTAL	157.6 AC.	2,967,700 SQ.FT.	12.6 ROAD AC.

GROSS ACRES 170.2
Existing development 2,419,000 Sq. Ft to be demolished
net new development 548,700 Sq. Ft.

*Projects in Area 1 are proposed to be developed in up to 12 individual lots

NOTE: Building locations are conceptual and subject to revision prior to finalization of site plans.

Source: PBR, 1997

Planning Consultants Research

Project Site Boundary
① Parcel Number
1.0 AC. Parcel Acreage

N

0 400 800 Feet

Concept Plan

related to erosion are expected to be similar under the revised project. Because the overall size of the project would remain the same, the number of persons on the project site exposed to seismic hazards would be the same under the revised project. Overall, no change to the conclusions presented in the Draft EIR with respect to earth resources would be required.

Air Quality - The Draft EIR concludes that emissions of nitrogen oxides (NO_x) and particulate matter (PM_{10}) during project construction would exceed South Coast Air Quality Management District (SCAQMD) thresholds and would thus be significant. In addition, the Draft EIR concludes that emissions of carbon monoxide (CO), reactive organic gases (ROG) and sulfur oxides (SO_x) would be below SCAQMD thresholds and would thus be adverse, but not significant. Construction emissions under the revised project would be the same as those shown in the Draft EIR since the overall buildout square footage of the revised project upon which the emissions estimates are based would be the same as for the original project.

For the post-construction occupancy period, the Draft EIR concludes that mobile and stationary source emissions of CO, ROG and NO_x would be above SCAQMD thresholds and would thus be significant while operational emissions of SO_x and PM_{10} would be below SCAQMD thresholds and would thus be adverse, but not significant. In addition, the Draft EIR concludes that localized CO concentrations at the intersections most affected by project traffic would be below state and federal standards. Operational emissions under the revised project would be the same as those shown in the Draft EIR since the total buildout under the revised project, and thus the project's traffic generation, would be the same as for the original project. The operational emissions estimates are based upon these two factors.

The Draft EIR concludes that the project would be consistent with applicable regional and City of Los Angeles air quality policies. Since the revised project would not substantially change from the original project with respect to proposed land uses and associated traffic generation, this conclusion would remain valid for the revised project. Overall, no change to the conclusions presented in the Draft EIR with respect to air quality would be required.

Surface Water - The Draft EIR concludes that no significant impacts with respect to storm drains would occur with implementation of measures to retain a portion of projected storm flows during the 50-year storm on-site. The revised project would include the same measures and thus would similarly avoid significant impacts with respect to potential flooding hazards to on-site structures. Moreover, since the total buildout of the revised project would be the same as the original project, the total amount of impervious surface expected under the revised project would be similar and overall projected runoff would be similar to the original project.

The Draft EIR also concludes that construction-related runoff would pose a potentially significant, but mitigable impact with respect to water quality, with implementation of stormwater runoff controls during construction. Since the amount of construction under the revised project would be the same as the original project and the same controls on construction runoff would apply, this impact would be expected to be the same as the revised project. Overall, no change to the conclusions presented in the Draft EIR with respect to drainage and surface water quality would be required.

Biotic Resources - The Draft EIR concludes that removal of existing on-site vegetation under the original project is not expected to result in significant impacts to biotic resources since the limited vegetated areas currently existing on the project site do not comprise sensitive habitat nor are they utilized by sensitive species. The revised project is expected to result in the removal of the same vegetated areas and replacement with similar ornamental landscaping as is projected to occur under the original project. Overall, no change to the conclusions presented in the Draft EIR with respect to biotic resources would be required.

Noise - The Draft EIR concludes that the project would have the potential to generate noise levels in excess of the 75 dBA City standard during construction and thus impacts related to construction noise from activity within both Area 1 and Area 2 would be potentially significant. The revised project would be expected to have similar impacts since the proposed land uses and total buildout, and thus the expected type and amount of construction activity, would not change under the revised project.

The Draft EIR concludes that operational noise impacts related to project traffic would be adverse because of existing high ambient noise levels in this area of the City, but would be less than the significance threshold of 3 dBA at which noise increases would be audible and would not perceptibly change the noise environment in the area. In addition, project buildings could potentially be significantly impacted by existing high ambient noise levels in the area, which exceed the City standards for clearly acceptable noise levels for retail, office and industrial park uses. The operational noise levels for the revised project would be the same as for the original project since the project buildout, and thus the traffic generation, for the revised project would be the same as the original project. The realignment of the project's internal roadway system would not locate any roadway closer to adjacent sensitive uses and thus create greater noise impacts than already identified in the Draft EIR. In addition, surrounding noise levels would have the same impacts on a similar number of project buildings under the revised project.

The Draft EIR concludes that stationary sources of noise within the project site would not have the potential to impact adjacent residences located to the south of the project site, with inclusion

of a sound wall at the southern edge of the project site. Since the overall buildout of the project site would be the same under the revised project and the sound wall would also be included as part of the revised project, impacts to these residential receptors would be the same under the revised project. In addition, the Draft EIR concludes that impacts from rail operations would be less than significant. The revised project would not be expected to generate any additional rail traffic nor to change the frequency of rail operations which constitute the source of this impact. Overall, no change to the conclusions presented in the Draft EIR with respect to noise would be required.

Light and Glare - The Draft EIR concludes that no significant impacts with respect to light and glare are expected to result from the proposed project. The revised project includes the same mix of land uses with the same total buildout and same height limits as under the original project. These uses would have the same potential to generate nighttime lighting and daytime and nighttime glare as was identified for the original project. Overall, no change to the conclusions presented in the Draft EIR with respect to light and glare would be required.

Land Use - The Draft EIR concludes that development in Area 1 would not cause any land use conflict with adjacent uses along 190th Street. Industrial park development within Area 2 could result in conflicts with adjacent residential uses, however, inclusion of project features such as the proposed sound wall and remediation of existing contamination conditions would minimize these impacts. Since the revised project would include the same land uses and total buildout at the same level as the original project, no additional potential for land use conflicts would be introduced. In addition, the realignment of the project's internal roadway system would not locate these roadways any closer to adjacent sensitive uses and thus create greater noise impacts than already identified in the Draft EIR.

The Draft EIR also concludes that the uses proposed for the project site would be consistent with the applicable provisions of the Harbor Gateway District Plan, existing zoning designation, General Plan Framework and Regional Comprehensive Plan. Since the same land uses and total buildout would be included in the revised project, the revised project would also be consistent with the applicable regional and City policies. Overall, no change to the conclusions presented in the Draft EIR with respect to land use would be required.

Transportation/Circulation - The Draft EIR concludes that traffic associated with the proposed project would be expected to result in significant impacts at 30 of 41 study intersections during the morning and/or evening peak hours. These impacts could be mitigated to less than significant levels at all but four of these intersections. Project traffic would also result in significant impacts at up to 3 freeway locations, for which no feasible physical mitigation

measures are available, within the jurisdiction of the City of Los Angeles. The impacts of the revised project would be expected to be the same as identified for the proposed project since the proposed land uses and project size, and thus the project's traffic generation, would be the same as for the proposed project.

Following submission of the comment letter, the Applicant identified proposed changes to the project's proposed roadway system in coordination with LADOT. Absent an agreement with the adjacent property owner regarding the proposed extension of 195th Street, it was decided to drop the proposed extension of 195th Street as a potential component of the project. Thus the location of a cul-de-sac on "C" Street west of "A" Street would not be necessary. Since it was not included as part of the original project, elimination of this cul-de-sac is not expected to change traffic flows in the area and no additional significant traffic impacts would be expected to result.

LADOT also expressed reservations concerning the advisability of not maintaining a direct connection between the Area 2 office/industrial park and 190th Street. Although analysis indicated that similar or better traffic conditions could be attained with the elimination of this access point, coupled with the extension of 195th Street, the infeasibility of the 195th Street extension necessitated the inclusion of permanent access to the office/industrial park area from 190th Street by replacing the proposed ingress-egress roadway and utility easement with a public or private roadway. Thus the proposed roadway system would be the same as that identified for the proposed project with respect to access from 190th Street and no additional impacts would be expected to result.

Overall, the proposed changes to the project's roadway system, as subsequently revised, would not result in any additional significant impacts beyond those identified in the Draft EIR.

Public Services (Police/Fire) - The Draft EIR concludes that the project would increase on-site population and activity on the project site which would have an adverse but not significant effect on police and fire protection and emergency medical service. Because the revised project would include the same uses and level of buildout, and therefore the same potential employee and visitor population, impacts to police and fire services would be the same as those identified in the Draft EIR. Although the roadway configuration would be modified slightly from the original project, adequate access to both the retail area and the office/industrial park area would continue to be provided. Traffic impacts on surrounding roadways would be expected to be the same as the original project since the buildout of the revised project, and thus the total traffic generation, would be the same as the original project. Overall, no change to the conclusions presented in the Draft EIR with respect to public services would be required.

Energy Conservation (Electricity, Natural Gas, Construction) - The Draft EIR concludes that the project would not result in significant impacts with respect to electricity, natural gas or construction energy consumption based upon projected buildout. Because the revised project would include the same uses and level of buildout, and therefore the same levels of energy consumption, impacts would be the same as those identified in the Draft EIR. Because the internal roadway configuration would change under the revised project, the locations of individual utility lines, which follow the roadway alignment, would be modified. However, adequate infrastructure to serve the proposed land uses would continue to be provided. Overall, no change to the conclusions presented in the Draft EIR with respect to energy consumption would be required.

Utilities (Communications, Water, Sewer, Solid Waste) - The Draft EIR concludes that the project would not result in significant impacts with respect to utility services (communications, water, sewer, solid waste) based upon projected buildout. Because the revised project would include the same uses and level of buildout, and would therefore generate the same demand for utility infrastructure, impacts would be the same as those identified in the Draft EIR. Because the internal roadway configuration would change under the revised project, the locations of individual utility lines, which follow the roadway alignment, would be modified. However, adequate utility infrastructure to serve the project's proposed land uses would continue to be provided. Overall, no change to the conclusions presented in the Draft EIR with respect to utility service would be required.

Risk of Upset - The Draft EIR concludes that potentially significant impacts could occur from the release of soil contaminants into the atmosphere if remediation is not undertaken prior to the initiation of construction activity resulting in soil disturbance. In addition, removal of asbestos from existing structures would result in a potentially significant impact which is reduced to a less than significant level through compliance with applicable regulatory requirements related to asbestos handling and disposal. Impacts are not expected to be significant with respect to groundwater since excavations are not expected to be deep enough to encounter contaminated groundwater and building locations are not expected to interfere with anticipated groundwater remediation activity. Because the overall buildout would be the same under the revised project, the overall level of construction activity would be similar and would include the same requirement that remediation activity be completed prior to undertaking any construction activity which results in soil disturbance. The impacts related to soil contamination would thus be the same as those identified in the Draft EIR. Demolition requirements would be identical under the revised project (i.e., demolition of all existing buildings currently located on the project site) and thus the impacts with respect to asbestos would be identical to those discussed in the Draft EIR. The revised project would modify the potential location of project

buildings and roadways slightly but would include the same uses and the same level of total buildout, which would be expected to have similar excavation requirements as the original project and would not preclude any groundwater remediation on the project site which may be required in the future. Overall, no change to the conclusions presented in the Draft EIR with respect to risk of upset would be required.

Aesthetics - The Draft EIR concludes that buildout of Areas 1 and 2, while changing the visual character of the project site as perceived from surrounding areas, would not result in significant impacts and could result in beneficial impacts from the introduction of new features, landscaping and open space to replace existing industrial buildings and surface parking lots. In addition, the two 120-foot tall pole signs proposed in Area 1 were determined to result in less than significant impacts, if approved in accordance with procedures established by the City for signage approval. The revised project would include the same land uses and the same total buildout as the original project and would therefore be expected to present a similar visual appearance as the original project. Although the location of particular buildings could differ slightly from the original project because of modifications in the internal roadway system and layouts of individual lots, the retail and industrial park components of the project retain their same relative locations as under the original project and would thus be perceived in a similar fashion from outside the site. The locations of the proposed 120-foot high pole signs would be expected to be similar under the revised project. Thus the impacts of these signs would be similar to those identified in the Draft EIR. Overall, no change to the conclusions presented in the Draft EIR with respect to aesthetics would be required.

Based upon the analyses presented above, no significant new information as defined in Section 15088.5 of the CEQA Guidelines has been added to the Final EIR. Section 15088.5 defines new significant information to include:

- A new significant environmental impact that would result from the project or a new significant impact associated with a new mitigation measure added after the Draft EIR was circulated;
- A substantial increase in the severity of an environmental impact that would result unless mitigation measures are adopted to reduce the impact to a level of insignificance;
- A feasible project alternative or mitigation measure considerably different from others analyzed is identified that would clearly lessen the significant environmental impacts of the project, but the project's proponents decline to adopt it;
- Concluding that the Draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

Based upon the analysis of the revised project presented above, none of the above conditions have been met. No changes to any of the conclusions presented in the Draft EIR with respect to the project's impacts would be required. Therefore, the lead agency concludes that the revisions to the proposed project contained in the comment do not result in the need to include any new significant information in the EIR for the Harbor Gateway Center and recirculation of the EIR as a result of the proposed changes in the project's vesting tentative tract map is therefore not required.

COMMENT No. 16:

March 21, 1997

Jerold B. Neuman
ALLEN, MATKINS, LECK, GAMBLE & MALLORY
515 South Figueroa Street, Seventh Floor
Los Angeles, CA 90071-3398

Re: Harbor Gateway Center Draft EIR; EIR No. 96-0090-SUB

Comment 16.1:

We represent the owner of the property at the southeast corner of 190th Street and Western Avenue in the City of Los Angeles immediately adjacent to the Harbor Gateway Center.

On behalf of our clients we have been asked to provide you with comments to the Harbor Gateway Center Draft Environmental Impact Report (DEIR). Our client is concerned with the potential environmental effects of this project relative to both its property and the area in general.

In order to provide you with comments in a coherent manner, we have set forth our specific concerns in a detailed format which identifies the specific pages or sections of the DEIR to which the comments relate.

However, prior to providing the specific analysis we feel it is important to set forth some of the general concerns which we have. To this end, we believe the DEIR to be inaccurate regarding the project description and many significant environmental impacts of the proposed project, including but not limited to, alternatives analysis, cumulative impacts, traffic and parking impacts, as well as, noise and air quality impacts.

As an initial comment, an alternative site analysis is completely absent in the DEIR, and while alternative project analyses are detailed, the analysis provided concerns a "Master Plan Block Alternative" which is both infeasible and does not provide a true alternative to the proposed project. In fact, the DEIR refers to this alternative as one which does not avoid or substantially reduce any project impacts as is required by the CEQA Guidelines.

Response 16.1:

The first four paragraphs of the comment are introductory and no response is necessary. These comments are acknowledged and will be forwarded to the decision-makers. With respect to alternative site analysis, as discussed in the Draft EIR, no feasible alternative site which could reasonably meet the objectives of the project was able to be identified. Specifically, in order to meet a principal objective of the project to provide a master-planned office/industrial park environment that meets the need for high quality industrial land uses in the City of Los Angeles, a large site located within the City of Los Angeles would be required. Other than the proposed project site, the Applicant does not own, control nor can the Applicant reasonably acquire or otherwise have access to an alternative site of comparable size in the City of Los Angeles (CEQA Guidelines Section 15126(d)). Because the project does not include "regionally significant impacts" (CEQA Guidelines Section 15126(d)(5)(A)), the lead agency considered the need to remain within its jurisdictional boundaries in concluding that "development of a site outside its boundaries would not address the objectives of the project, cannot be realistically considered and successfully accomplished by the Applicant and therefore would be infeasible" (Draft EIR, page 343). Examination of an alternative site was therefore judged not to be required for this project by the lead agency.

Comment 16.2:

Additionally, one of the most important concerns of the project is the ability to provide adequate workable parking. This is not even addressed in the DEIR. The proposed supply of 2,200 parking spaces is significantly below code requirements and significantly below peak parking demands, and have not adequately been evaluated in the DEIR. Further, the parking analysis only addresses parking for Area 1 with no analysis of parking demand or code required parking for Area 2.

Response 16.2:

Except for Area 1, no exception to the Municipal Code requirements for stand-alone uses is being requested. For Area 1, as is provided for in the Municipal Code, a shared parking entitlement may be sought, depending upon the final configuration of the Area 1 retail center. Appendix C of the project traffic study (contained in Appendix F of the Draft EIR) presents a detailed analysis of the parking demand for Area 1 of the project site. As demonstrated in this analysis, the proposed 2,200-space surface lot would provide more than adequate parking for the uses proposed for this Area. The future uses within Area 2 are not known at this time and thus parking facilities for these uses have not been designed. As discussed in the Draft EIR on

page 73, the Municipal Code standards are considered adequate to ensure that an appropriate level of parking is provided for the Area 2 portion of the site.

Comment 16.3:

As a final general comment, this project provides substantial concerns relative to its traffic impacts. In this regard, the traffic analysis does not include the analysis required in the Congestion Management Program by the Los Angeles County Metropolitan Transit [sic] Authority and is also required in the City of Los Angeles Guidelines for Traffic Impact Studies. Therefore, much of the needed data with regard to the analysis of traffic impacts is not present within the context of the DEIR, and while this is not the only deficiency relative to the analysis of traffic impacts, it is a significant omission which we believe needs to be corrected.

Response 16.3:

Please see Responses 2.2 and 16.20.

Comment 16.4:

The foregoing general comments are meant to provide a flavor of the more specific analysis which is set forth below, and is not intended by any means to be an exhaustive listing of the general inadequacies of the DEIR, but rather to provide a background for the following specific comments.

Page 53 The Project Description refers to a Vesting tentative tract map, without reference to the map number or the number of parcels to be created. The EAF prepared by the project applicant refers to Tract 52172; if this is the Vesting tentative tract map, then it should be referenced and explained. A copy of the tract map should be included as part of the DEIR.

Response 16.4:

The cover page of the Draft EIR, which precedes the Table of Contents, indicates that Vesting Tentative Tract No. 52172 is the subject of the Draft EIR and provides a description of the proposed project. As noted, page 53 of the Draft EIR indicated that the Applicant is seeking approval of a subdivision action from the City and specified that up to 45 lots would be created. The number of lots was subsequently modified by the Applicant to approximately 44. See Corrections and Additions No. 1a. A specific reference to Vesting Tentative Tract No. 52172

has been added to the Project Description. See Corrections and Additions No. 1c. The Applicant has submitted proposed revisions to the vesting tentative tract map to the City. See Comment No. 15.1.

Comment 16.5:

Page 65-66 The DEIR states that a total of 2,418,938 sq. ft. would be demolished on the project site, including 624,519 sq. ft. in the 40-acre "Area 1." It is our understanding that approximately 640,000 sq. ft. has already been demolished in this area, and that demolition activities are continuing. Therefore, only the 1,794,419 sq. ft. of buildings in Area 2 currently exist on the project site, some of this space may have been demolished, or may be planned for demolition in the near future. The DEIR should be revised to reflect the current conditions on the project site.

Response 16.5:

This comment is acknowledged. The Applicant has initiated the process of demolishing approximately 629,000 square feet of existing buildings in anticipation of completing the remainder of the proposed project after the City's review and approval is completed. The Project Description has been modified to account for this activity. See Corrections and Additions Nos. 1b, 1d and 1i. However, demolition of all buildings existing on the site at the initiation of the proposed project, which totalled approximately 2.4 million square feet of space, is part of the project which is evaluated in the EIR.

Comment 16.6:

Page 82-87 The related projects list in the DEIR does not sufficiently detail all related projects. Cumulative development missing from the related projects list includes 91,100 sq. ft. of office space, 466 dwelling units, 125 hotel rooms, 249,200 sq. ft. of manufacturing uses, a 48 acre golf course and 55,000 sq. ft. of retail uses.

Thus, cumulative impacts are understated throughout the DEIR (particularly in traffic, air quality, noise, and utilities).

Response 16.6:

Table 5 of the Draft EIR shows the 36 related projects which were specifically identified and analyzed in the Draft EIR. This list includes all projects which could be identified by a review of the records of the Cities of Carson, Gardena, Los Angeles and Torrance and was coordinated with the Department of City Planning and the Department of Transportation. The commentor does not indicate specific additional projects which should have been included, in order to determine whether such projects may already be included in the Draft EIR related projects list. Therefore it is not possible to simply include the development totals listed in the comment. In addition to the specifically identified projects, area growth as projected by the Southern California Association of Governments (SCAG) was also taken into account. This growth accounts for any not yet proposed or otherwise unidentified potential related projects. Thus, the cumulative impact analyses provided in the EIR are considered to be adequate.

Comment 16.7:

Page 106 The DEIR overestimates the emissions generated by existing mobile sources. These emissions are based on 8,560 vehicle trips, which is the trip generation based on ITE rates applied to 2,419,000 sq. ft. of warehousing. As mentioned above, a maximum of 1,794,419 sq. ft. actually remain on the site; therefore, it would be impossible for the site to generate this level of emissions. Additionally, Section 15125 of the CEQA Guidelines states that the environmental setting is "a description of the environment in the vicinity of the project, as it exists before the commencement of the project" (emphases added). As such, existing emissions should be based on the traffic generated by existing warehousing operations on the site, not the potential re-use of all 2,419,000 sq. ft. as warehousing -- particularly when the buildings are in the process of being demolished, only 1.8 million sq. ft. of buildings remain, and it is unknown how much space will be left after demolition activities are completed.

Response 16.7:

At the time that the project was proposed, a total of 2.4 million square feet of building area was present on the site. This constituted the existing condition before the commencement of the project and the project is defined as including the demolition of all previously existing structures totalling approximately 2.4 million square feet of space. All of this area was in use either as a manufacturing facility or as a warehouse/distribution facility. These buildings, if not for the project, could and would have remained in use. In anticipation of implementing the remainder

project, these uses are being phased out and the vacated buildings demolished. However, this demolition would not be occurring without the project. Therefore, the credits for these uses are consistent with City guidelines in that all buildings were occupied by warehousing or more intense uses for at least six months of the preceding two years before an application is filed with the City. In keeping with City policy, credits for previous uses are not necessarily based only upon the traffic generation occurring at the time a project is proposed, but rather are reflective of the amount of traffic which would be generated in the absence of the proposed project. The demolition of the existing site buildings is part of the project as described and analyzed in the EIR. Therefore, it is reasonable to assume that without the project, the site would have continued in use as a warehousing center or converted to a more intense use. See also Response 16.8.

Comment 16.8:

Page 112 As discussed above, existing emissions are overstated in Table 13. Net impacts of the proposed project on air quality are understated. Impacts should be recalculated with a realistic estimate of existing emissions.

Response 16.8:

As indicated in Response 16.7, the credit for trips which would be expected to occur without the proposed project is appropriate and consistent with City policy regarding allowable offsets to trip generation for uses on a project site which have been active for at least six months of the preceding two years. Thus, this same offset is appropriate for use in the air quality analysis as shown in Table 10 on page 107 and Table 13 on page 112 of the Draft EIR. However, it should be noted that even if no credit for previous trips were to be taken, the conclusion of the analysis of regional operational emissions would be the same (i.e., project-related operational emissions would exceed SCAQMD thresholds for CO, ROG and NO_x and would be significant while project-related operational emissions of SO_x and PM_{10} would be below SCAQMD thresholds and would be adverse, but less than significant).

Comment 16.9:

Page 165 Existing noise generation is also overstated, based on vehicle trips which do not currently exist. Therefore, net impacts on the ambient noise environment are understated. Impacts should be recalculated with a realistic estimate of existing noise generation.

Response 16.9:

The existing noise levels in the vicinity of the project site which were utilized in the noise analysis presented in Section IV.E of the Draft EIR are based upon actual noise measurements presented in Table 18 on page 159 of the Draft EIR and not, as the comment suggests, on vehicle trips "which do not currently exist". These measurements were used to calibrate the noise model utilized for the project (Caltrans LeqV2, see Draft EIR page 161), along with actual traffic counts obtained at the same time as the noise measurements. This model was then used to project the existing noise levels for other roadway segments in the vicinity of the project, based upon the actual traffic counts for those segments obtained from the project's traffic study. These existing (1996) modeled noise levels for eight roadway segments adjacent to the project site are presented in Table 20 on page 165. Because these noise levels are based upon actual traffic counts, and form the basis from which the assessment of the impacts of the project was made, the noise analysis would not be affected by any trip credits incorporated into the traffic analysis performed for the project.

Comment 16.10:

Page 168 Mitigation Measure No. 7 is infeasible, because the project applicant cannot impose these requirements on other property owners along 190th Street, Western Avenue, and Normandie Avenue. Therefore, this project would have significant unmitigated noise impacts on these properties.

Response 16.10:

Mitigation Measure 7 on page 168 of the Draft EIR is intended to apply only to project buildings (i.e., page 168 of the Draft EIR refers to "all on-site uses") and requires inclusion of design features to ensure suitable interior noise levels within all project buildings. It was included in the Draft EIR to address the impact identified on page 166 of the Draft EIR, which is the impact of exterior ambient noise levels which exceed the City's standards of clearly acceptable noise levels for retail, office and industrial park uses. While project traffic contributes to these noise levels, project-related traffic would result in less than audible noise increases and is thus concluded not to cause a significant impact. The source of the impact addressed by this mitigation measure, then, is other, *non-project related,* traffic utilizing the streets which pass by the project site. The City would require similar mitigation measures for all new projects in this area which require discretionary review by the City. However, the City has no means available to require installation of such features within existing buildings.

Comment 16.11:

Page 187, 193 The section on Relevant Land Use Policies refers to the proposed General Plan Framework. The DEIR should be revised to reflect the fact that the Framework has now been adopted.

Response 16.11:

The requested changes have been made. See Corrections and Additions Nos. 4a and 4b.

Comment 16.12:

Page 199 The statement under (3) Traffic Related Impacts that "neither air quality nor noise effects associated with the increase in motor vehicle traffic would cause an exceedance of an established air quality or noise threshold" directly contradicts the noise section (page 166). It is stated on that page that, because noise levels along major roadways exceed clearly acceptable levels, any increase in traffic-related noise associated with the project is considered to have an adverse effect, and these impacts would be considered potentially significant. Consequently, this would result in potentially significant land use compatibility conflicts related to project traffic.

Response 16.12:

The comment presents the analysis included on page 166 of the Draft EIR out of context. The analysis on page 166 addresses two issues. In the first full paragraph on that page, the Draft EIR concludes that the project would not result in a significant traffic noise impact because increases in noise levels attributable to project traffic would be inaudible (i.e., less than 3 dBA) in all cases. However, because of existing high ambient noise levels in this area from non-project related sources, any increase in noise levels is considered an adverse (but less than significant) effect.

In the second full paragraph, a different issue is examined. As noted in Response 16.10, this portion of the noise analysis addresses an impact *on* future project buildings resulting from noise levels generated by other, non-project related, ambient traffic. This analysis concludes that these projected future noise levels would exceed the City's definition of clearly acceptable noise levels for the uses which would be included in the project and concludes that impacts to these receptors (meaning the future project buildings) from these noise levels would be significant.

Mitigation measures are then included to ensure that project buildings will provide acceptable interior noise levels for employees and visitors to those buildings.

Thus the comment's references to "adverse effect" and "potentially significant" in the same sentence is incorrect. No significant land use compatibility conflict related to project traffic would occur.

Comment 16.13:

Page 225 Appendix F does not adequately document the demand for parking on site. It merely assesses code required parking requirements and applies undefined internal capture rates and hourly adjustments to reflect shared use of spaces and incorrectly concludes that the peak demand will be 1,800 spaces. Appendix F calculates the number of spaces required by code for the shopping center/theater component of the proposed project as 2,520 spaces, not 2,380, as stated in Section IV. H. The proposed supply of 2,200 spaces is significantly below code requirements and significantly below the peak parking demands, which have not been adequately evaluated in the DEIR. As noted above, the Appendix F analysis of parking does not assess demand, it assesses code requirements and presumes that the two are equal. Application of ITE Parking Generation rates to the stand alone uses results in the total demand of 3,771 spaces on weekends, as opposed to the 2,520 total of code requirements. It is also not correct to apply both an internal capture rate and a shared parking adjustment to the stand-alone parking rates. If the internal Capture rate is intended to indicate that 20% of the restaurant parking demand is provided by parking required for the retail uses, the further application of hourly reductions in the parking demands to reflect shared use of spaces, double discounts this same phenomenon. If the same parking space is occupied by someone who came to shop and then stays to dine, it means that parking space is occupied longer and when the next retail customer comes to park in the retail parking space, it will be occupied by a restaurant patron and the retail parker will park in a restaurant space. The increase in parking duration by persons staying on site to visit two establishments offsets the internal capture rate reduction in parking ratios that the DEIR authors have assumed. The parking analysis is incorrect in not identifying a significant shortage of parking in the retail/theater component of the proposed project and fails to disclose the impacts of this parking shortage or the mitigation measures to correct it.

Further, the parking analysis only addresses parking for Area 1; no analysis of parking demand or code-required parking is provided for Area 2. Therefore, it cannot be ascertained from the DEIR whether Area 2 parking would meet City code requirements or the demand for parking generated by the proposed uses. The DEIR should be revised to include this information.

Response 16.13:

The shared parking calculations are fully documented in Appendix C to the traffic study, which is contained in Appendix F to the EIR. The 2,380 spaces reflect code requirements with internal capture. As noted by the commentor, 2,520 spaces would be required by Code, without a shared parking entitlement and if no internal capture adjustment were applied.

The shared parking analysis utilizes Municipal Code parking requirements since they have been found by the City to provide adequate parking for stand-alone uses (i.e., meet the peak parking demand of a facility which must rely solely on the parking supply constructed for that facility). See Response 16.39 for a discussion of the use of ITE formulas. Adjustments were then made for the internal capture of a site. Internal capture has been demonstrated by empirical studies to reduce overall parking demand (see Shared Parking, Urban Land Institute, Washington D.C., 1983). However, even if the internal capture is not considered, total shared parking demand for Area 1 would only be 1,847 spaces, well below the 2,200-space supply.

No adjustment from stand-alone code requirements are being sought for Area 2. Since the City has found stand-alone Municipal Code requirements to provide adequate parking, no further analysis is required for Area 2.

Comment 16.14:

Page 230 The traffic analysis is based on the presumption that there will be three rail crossings along Normandie Avenue to serve as project access points, but does not disclose the turning movements into and out of each of the access points. It only provides data on one of the access points along Normandie Avenue. Section IV. H. acknowledges the possibility that approval for these additional rail crossings may not be obtained, but incorrectly concludes that concentration of all traffic at one access point on Normandie would not cause additional impacts or require additional mitigation measures. With only one access point on Normandie, instead of the three assumed in the traffic analysis, the single access intersection could become overly congested and result in a shift of project traffic to alternate

access points. Or it could cause a major bottleneck on Normandie Avenue. Without explicit traffic data and level of service calculations at all three driveways and with the single driveway alternative, it is not possible to draw the conclusion that the single driveway could function adequately and would not require additional mitigation. The analysis of all driveways under all potential access scenarios should be updated and added to the traffic study. It should also be presented for the peak holiday shopping season to assure the public that the access plan will be adequate during the shopping season.

Response 16.14:

The roadways accessing the site from Normandie Avenue will provide access to both the retail and office/industrial portions of the site. Since office and industrial parcels have only nominal generation on weekends, weekday evening peak periods will remain the critical design time for the site access roads to Normandie Avenue throughout the year. As the review of the trip generation for Christmas and non-Christmas season in the following table shows, trip generation rates for a weekday evening peak hour are virtually identical for Christmas and non-Christmas seasons for 450,000 square foot shopping centers. Therefore, the weekday evening analysis contained in the traffic study is considered adequate for all seasons of the year.

TRIP GENERATION FOR A 450,000 SQUARE FOOT SHOPPING CENTER
WEEKDAY P.M. PEAK HOUR OF ADJACENT STREET
CHRISTMAS SEASON VS. REMAINDER OF YEAR

	P.M. Peak Hour Trips	P.M. Peak Hour Trip Rate (per 1,000 square feet)
Christmas Season	1,684	3.74
Average Weekday	1,711	3.80

Source: Crain & Associates

Should no new rail crossing be allowed, all traffic directly accessing Normandie Avenue would need to utilize the existing site access roadway opposite Francisco Street. The following table shows the anticipated operations at this intersection if only one Normandie Avenue access roadway is provided. As this table shows, the mitigation measures recommended in the Draft EIR would be sufficient to mitigate project impacts to less than significance.

Future (2006) Traffic Conditions
With Only One Normandie Avenue
Project Access Roadway

		Without Project		With Project			With Project and Mitigation		
	Peak Hour	CMA	LOS	CMA	LOS	Impact	CMA	LOS	Impact
Normandie Ave. &	A.M.	0.493	A	0.583	A	0.090	0.585	A	0.092
Francisco St.	P.M.	0.552	A	0.959	E	0.407*	0.648	B	0.096

* *Significant Impact*

Source: Crain & Associates

The volumes which would occur in the unlikely event that only a single driveway is provided are shown in the figure on page 170.

Comment 16.15:

Page 256, 262, 273 — The electricity, natural gas, and water consumption for existing uses is based on the actual consumption in 1995; this approach should be used throughout the document (existing traffic generation should be based on the actual current uses, not the potential re-use of the site).

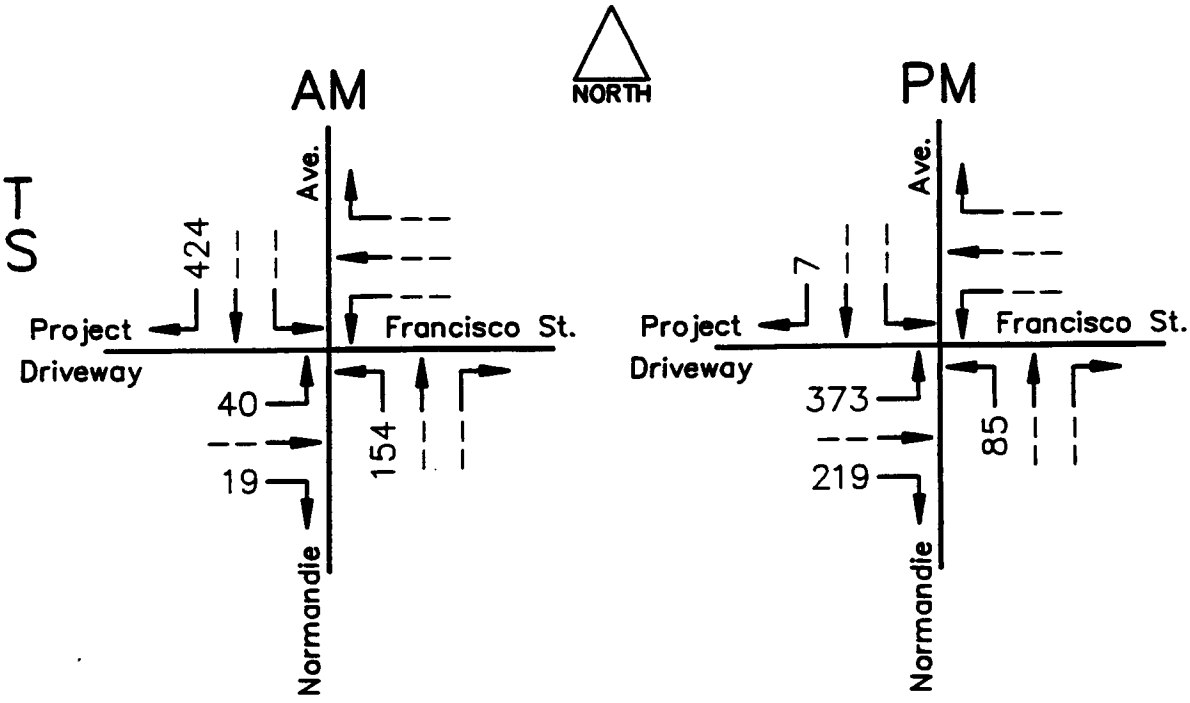
Response 16.15:

See also Response 16.7. Regardless of the approach utilized in other technical sections of the Draft EIR, the use of trip credits in the traffic analysis prepared for the project is consistent with City policy regarding appropriate offsets for trips generated by previous and existing uses.

Comment 16.16:

Page 289-290 — It appears that a Phase II assessment has been done for the retail portion of the site (Area 1), but no Phase II assessment has been done for the rest of the site (Area 2). If the site requires major remediation, this could take several years, which would affect the start date for construction and ultimately, the buildout date. Finally, the discussion of Area 2 impacts (pages 299-300) is pure speculation. Since no Phase II Assessment has

PROJECT VOLUMES



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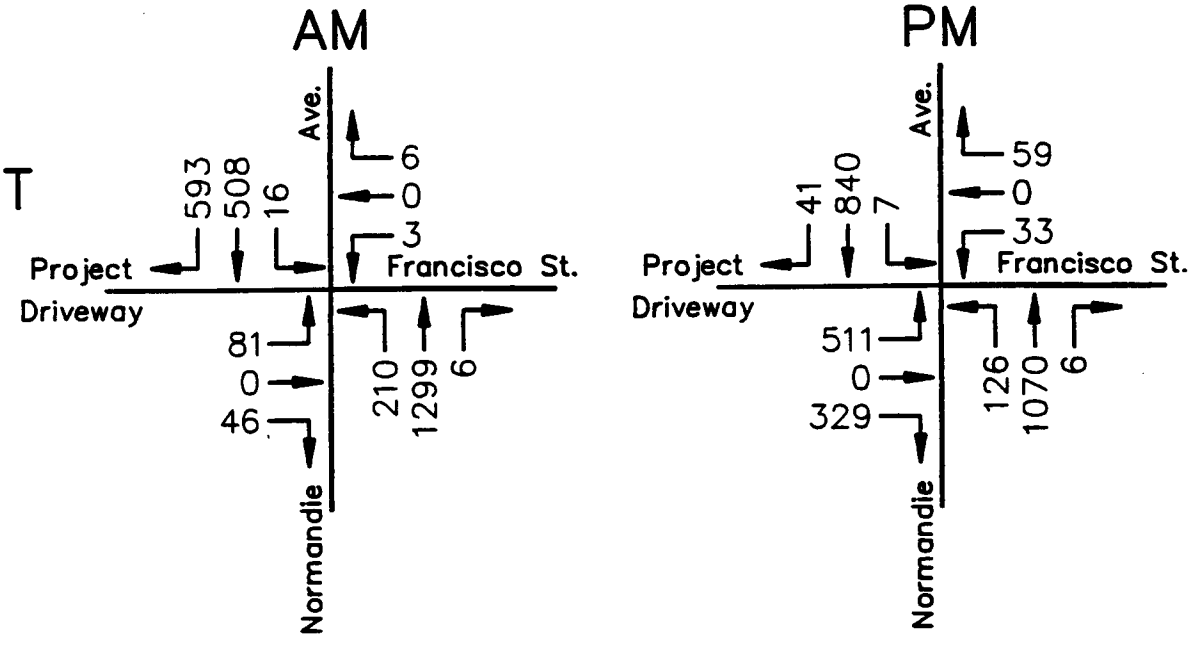

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FUTURE (2006) CONDITIONS
WITH ONLY ONE NORMANDIE AVE. DRIVEWAY

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2007 Sawtelle Boulevard
Los Angeles, California 90025
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Transportation Planning · Traffic Engineering

been completed for Area 2, the discussion of impacts is subjective and unclear.

Response 16.16:

The Applicant is currently undertaking a program, in coordination with the Regional Water Quality Control Board, to monitor soil conditions in the areas of concern identified in the Draft EIR in conjunction with demolition activities which are currently ongoing. Data generated from this monitoring activity is being used to identify appropriate remediation for contaminated soils which are encountered. In addition, soil borings are being undertaken on other areas of the site (including areas of concern within Area 2) and a health risk assessment (HRA) is being developed which will be used as a basis for establishing future remediation activity. All of this activity is being undertaken in conjunction with the Regional Water Quality Control Board. With this activity currently underway, along with the active participation of the cognizant regulatory agency, it is expected that all required remediation will be able to be completed within a time frame which is consistent with the projected buildout date for Area 2 (i.e., 2006).

The discussion of impacts in Area 2 presented on pages 299-300 of the Draft EIR was based upon the Phase I assessment undertaken for Area 2 which identified a limited number of areas of potential environmental concern which are now undergoing further investigation as discussed above. It was therefore not based upon speculation, but rather on data generated from the appropriate and feasible level of analysis which could be conducted at the time the Draft EIR was completed. The Draft EIR included mitigation measures designed to ensure that the required follow-on analysis was identified, performed and remediation implemented to the satisfaction of the appropriate regulatory agency prior to undertaking activity resulting in soil disturbance, in order to ensure that project implementation would not pose any health risk to residents, employees or visitors to the project site or in the immediate vicinity.

Comment 16.17:

Page 344 The No Project Alternative is misleading to the reader. The 2.4 million sq. ft. of existing industrial and warehouse buildings would not remain, as approximately 640,000 sq. ft. have already been demolished, and demolition activities are ongoing. Therefore, these buildings could not be reused, and this alternative would have substantially reduced impacts in comparison with the proposed project. This alternative needs to be rewritten to reflect the amount of space which will actually remain on the site following demolition activities.

Additionally, this alternative (page 345) states that "Current on-site uses generate an estimated 8,560 daily vehicle trips." This statement needs to be substantiated, as the DEIR previously stated (on page 79) that only about 380 employees remain on site. It seems unlikely that the activities of 380 employees could generate anywhere near 8,560 daily trips.

Response 16.17:

The description of the No Project Alternative has been revised to reflect the changes on the project site which have occurred since the Draft EIR analysis was completed. See Corrections and Additions No. 10a. The analysis of the No Project Alternative indicates that the environmental impacts of the No Project Alternative would be less than the project as proposed. These conclusions would not change as a result of reducing the existing square footage of buildings located on the site. The reference in the Draft EIR to 8,560 existing trips is incorrect. This reference should have been to 8,560 trips which would be expected to occur in the absence of the project and has been corrected. See Corrections and Additions No. 10b and Response 16.7.

Comment 16.18:

Page 348 The Master Planned Block Alternative is not an alternative to the proposed project. Development on the McDonnell Douglas property would remain essentially the same as the proposed project, with the same impacts. This alternative places the burden of mitigating the McDonnell Douglas project impacts on the adjacent property, as any reduction of impacts is achieved by the alternative land uses on the International Light Metals site. This alternative would also include the continuation of 195th Street through the International Light Metals site to Western Avenue, however, the potential impacts of this extension are not addressed.

Section 15126(d)(1) of the CEQA Guidelines states that "the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project." This alternative does not avoid or substantially reduce any project impacts. The DEIR actually states this; it only claims to reduce the combined impacts of both projects. However, it is the impacts of the adjacent project which are reduced, not the McDonnell Douglas project. Therefore, pursuant to

Section 15126(d)(1) of the CEQA Guidelines, this alternative should not be considered in the DEIR.

Further, CEQA Guidelines Section 15126(C) states that "An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative." The Master Planned Block Alternative is speculative in that Lockheed Martin, the project applicant for the International Light Metals property, does not intend to participate in such a development. An EIR need only consider a range of feasible alternatives, not all possible alternatives. Given that Lockheed Martin has no intention or desire to participate in a coordinated master planned alternative with the McDonnell Douglas property, the suggested alternative is not considered feasible, and should be deleted from the DEIR.

Response 16.18:

As noted in the Draft EIR, the Master Planned Block Development alternative was included in order to demonstrate the potential environmental impacts should the planning and development of the two sites be coordinated, an appropriate consideration for the City's decision-makers. However, inclusion of the alternative does not mandate its adoption. The Draft EIR specifically notes (page 352) that, because the alternative would involve development of the adjacent property, it would require the cooperation of the adjacent property owner in order to be feasible. In the absence of such voluntary cooperation, implementation of the alternative would be infeasible since the City has no authority to compel such cooperation. However, even though an alternative may be infeasible, it need not be removed from the EIR. Rather, determination regarding the feasibility of alternatives analyzed in the Draft EIR is more appropriately addressed when the decision-maker adopts findings for the project pursuant to Section 21081(a)(3) of the Public Resources Code.

Comment 16.19:

Page 376 The DEIR fails to clearly identify which alternative would be considered the Environmentally Superior Alternative. It is not clear why the Reduced Intensity Alternative would be superior to the Golf Course Alternative. It is not clear whether the DEIR is stating that the Master Planned Block Development Alternative would be environmentally superior to the Reduced Intensity or Golf Course Alternatives. In either case, the Master Planned Block Development Alternative should be deleted, because it does not avoid or substantially reduce

any project impacts, it only reduces the impacts due to development on the adjacent property, and translates that to "reduction of the combined impacts" of both projects. The DEIR should be revised to clearly identify which alternative would result in the fewest environmental impacts, and thus be considered the Environmentally Superior Alternative.

Response 16.19:

Page 376 of the Draft EIR identifies the No Project, Reduced Intensity and Golf Course alternatives as environmentally superior to the proposed project. Specifically, the Draft EIR states: "The Reduced Intensity is considered the overall environmentally superior alternative because it would reduce impacts in most issue areas while creating redevelopment benefits similar to the proposed project." This conclusion was based upon the discussion presented on pages 364 to 366 of the Draft EIR which identify that the environmental impacts of the alternative would be generally less than the project because of the reduced size of the alternative. This would be true for all environmental issue areas except Plant Life, where the impacts would be similar to the project. In addition, on page 366, the Draft EIR concludes that the Reduced Intensity alternative would generally meet the objectives of the project, although to a lesser degree than the proposed project.

The Golf Course alternative, on the other hand, would have higher impacts than the project with respect to earth moving, water quality and consistency with land use policies and lower impacts in other environmental issue areas, as presented on pages 367 to 369 of the Draft EIR. The Golf Course alternative would not meet most of the project objectives, as discussed on pages 369 and 370 of the Draft EIR. It would therefore not be superior, on an overall basis, to the Reduced Intensity alternative.

As noted on page 376 of the Draft EIR, the Master Planned Block alternative would be environmentally superior to the combined projects. For purposes of determining the environmentally superior alternative, this alternative was not compared to the proposed project because the most valid point of comparison for this alternative is provided by the combined projects, as discussed on pages 350 and 351 of the Draft EIR. The same reasoning would also apply to comparing the Master Planned Block alternative to the other alternatives. Such a comparison would not be valid because of the differential between the size of the Master Planned Block alternative and the other alternative projects. It is noted here as well that implementation of the Master Planned Block alternative would not be feasible without the cooperation of the adjacent property owner.

Comment 16.20:

Comments on Appendix F

no page The traffic analysis does not include the analysis required in the Congestion Management Program (CMP) by the Los Angeles County Metropolitan Transportation Authority (MTA) and as required in the City of Los Angeles Guidelines for Traffic Impact Studies. The CMP requirements include the analysis of all CMP arterial monitoring intersections where the proposed project will add 50 or more peak hour trips and the analysis of all freeway mainline locations where the proposed project will add 150 or more peak hour trips. The CMP also requires that the number of transit trips to be added to transit routes in the vicinity of the proposed project be disclosed. City of Los Angeles guidelines also require that the calculation of CMP "credits" and "debits" which will be accrued by the City in approving the proposed project be reported. The CMP required analysis should be added to the traffic study.

Response 16.20:

Analysis of all CMP intersections with anticipated project volumes of 50 or more vehicles per hour and all freeway monitoring locations with anticipated project volumes of 150 or more vehicles are included in Appendix F. For an analysis of project CMP debits and credits, see Response 2.2. Total transit ridership from the project is anticipated to be nominal as only two lines serve the streets adjacent to the project. As a worst case, the CMP recommended assumptions of an average of 1.4 persons per vehicle and a 3.5 percent transit mode split were used. These are consistent with the Metropolitan Transportation Authority's planned transit levels, and thus represent the level which could be attracted should planned transit improvements go forward. The following tables shows the anticipated transit ridership under the CMP assumptions:

Total Site Generation at Project Buildout

		A.M. Peak Hour		P.M. Peak Hour	
	Daily	In	Out	In	Out
Transit Riders	1,465	104	19	46	97

As indicated by mitigation measure 3 on page 223 of the Draft EIR, the project should work with the appropriate transit district to improve transit service to the site. This should include encouraging MTA to go forward with their planned improvements to area bus service.

However, no discount has been taken into account in the traffic analysis for any potential transit ridership within either the without or with mitigation scenarios. Should significant transit ridership occur, traffic impacts will be less than those projected in the traffic study.

Comment 16.21:

no page The traffic analysis does not address the potential for diversion of traffic from the arterial streets to adjacent residential streets to avoid congestion. The DEIR should address the impacts of the project on congestion on Normandie Avenue and the potential for spillover to residential streets.

Response 16.21:

The mitigation proposed in the EIR for the project will eliminate all significant project surface street impacts along Normandie Avenue. Thus, no diversion of traffic into residential neighborhoods would be expected along Normandie Avenue as a result of the project. The mitigation measures would also reduce all impacts to less than a level of significance to the north of the freeway. Thus, no overflow of traffic into the residential areas to the north would be anticipated. The area surrounding the project to the south and west of the freeway are primarily industrial and, therefore, residential analysis is not appropriate. Further, as is demonstrated by the analysis of the CMP credits and debits (see Response 2.2), the project will add more capacity to the roadway system than is required to offset project impacts. Thus, no areas are anticipated to be significantly impacted by an increase in residential traffic volumes as a result of the project.

Comment 16.22:

Page 5 The project description states that the plan consists of a 450,000 square foot shopping center. This description should clarify the fact that the center includes 30,000 square feet of restaurants, which has parking and trip generation implications in and of itself which are discussed later.

Response 16.22:

The potential for up to 30,000 square foot of restaurants within the 450,000 square foot shopping center is stated on Page 53 of the DEIR as well as in other places throughout the document. The up to 30,000 square feet of restaurants within a 450,000 square foot shopping

center (i.e., less than 7%) is considered a normal to low percentage of restaurants for this size of shopping center and thus was not identified as a special component within the traffic study.

Comment 16.23:

Page 5 The project description states that "until recently, the buildings were used for aircraft manufacturing and assembly." The date when they were last in use should be specified because LADOT guidelines for traffic impact studies clearly state that "any claim for trip credits for an existing active land use which is applied to calculate net new trips requires that the existing use was in place at the time of the existing base year traffic counts. Generally for CEQA purposes this means the existing use must have been in place for 6 months within the past 2 years." It is unlikely that the aircraft manufacturing and assembly was in full operation for 6 months within the last 2 years and the project should therefore not be allowed to claim a credit for the aircraft and manufacturing space.

Response 16.23:

While manufacturing activities for many of the site buildings were conducted for at least six months in the two years preceding preparation of the traffic study, it was conservatively decided not to utilize credit at that level of activity. Rather, the less intense warehousing use was assumed. All buildings within the site had been used for either manufacturing or warehousing for more than six months of the two years prior to the preparation of the traffic study. Therefore, the credits for previous use analyzed in the traffic study are considered conservative.

Comment 16.24:

Page 5 The project description also states that "currently, the buildings are used as a warehousing and distribution facility." It is unlikely that all 2,419,000 square feet are currently actively used for such purposes given that some of the buildings have been torn down. The DEIR author's 1996 existing conditions traffic counts (Figures 3a and 3b) confirm this fact by illustrating 0 trips turning into and out of the site at the three main project access points. The DEIR traffic study should not take a credit for existing trip generation at the site without substantiating that there is such trip generation at the site. If it is currently actively utilized, driveway counts should be provided to document the existing trip generation of the site.

Response 16.24:

Please see Response 16.7. Also please note that, contrary to the indication in the comment, existing traffic volumes are shown entering and exiting the site along 190th Street. The 0 trips turning in and out of the site from 190th Street is at the location of the future project driveway located opposite the southbound San Diego Freeway off-ramps, which does not presently exist. Figures 3(a) and 3(b) in Appendix F indicate existing turning movements into and out of the project site at the existing project driveway at Denker Street. This roadway is shown roughly at the western of the project site at 190th Street because the figures are not drawn to scale. There are no turning movements shown at the other project site driveways (from Western and Normandie Avenues) because those gates were not open at the time the traffic counts were taken. If these gates had been open, existing activity on the project would likely have resulted in the movement of some traffic on and off the project site at those locations.

Comment 16.25:

Page 5 The project description states that "additionally, access via an extension of 195th Street across the adjacent vacant site to the west, formerly used by Lockheed Aircraft, could be provided as part of the redevelopment of that site. "This reference should be stricken from the project description and deleted from the Site Plan (Figure 2) as they are inconsistent with Lockheed-Martin's proposed plans for their site. The DEIR should not confuse the public, nor decision makers, with the allusion to potential additional access to this site which is not feasible.

Response 16.25:

Joint access for the project and the adjacent site would benefit area traffic conditions. Therefore, it was appropriate to discuss such a potential in the Draft EIR. However, since the adjacent property owner has proven unwilling to consider such an extension, the potential for including such a facility has been deleted from the project (see Comment 15.1).

Comment 16.26:

Page 7 The description of the main project driveway on 190th Street opposite the southbound San Diego Freeway off-ramp notes that "some turning movements to and from this driveway could be restricted." What does this mean? Has Caltrans approved the location of a driveway directly opposite the ramp terminal

and have they concurred in full access to/from this driveway? The traffic analysis is based on the assumption that all turning movements will be allowed at this location. It should also identify the potential impacts associated with no access at this location or restricted access, as implied in the project description.

Response 16.26:

LADOT and Caltrans will evaluate the operations of this driveway at the time detailed site plans are prepared and submitted. Both agencies have preliminarily reviewed this concept but neither agency has approved or rejected this concept. Should the driveway have one or more movements restricted, those movements would be made at other driveways along 190th Street. Although access would not be as convenient, no significant adverse traffic impacts would be anticipated by relocating these volumes to adjacent driveways.

Comment 16.27:

Page 11 The DEIR notes that new counts were conducted and that they were adjusted to reflect full operation of the project site as a warehouse facility. The dates on which the counts were taken should be disclosed. The fact that the DEIR acknowledges that the existing counts had to be adjusted to "reflect full operation of the project site as a warehouse facility" confirms that is not currently fully operational and therefore should not be subject to a trip credit for existing trips generated by all 2,419,000 square feet of space.

Response 16.27:

The counts were conducted between August, 1995 and March, 1996, inclusive. In order to accurately reflect conditions likely to occur should the project not have been initiated, the without project scenario volumes were adjusted to reflect the full operation of the site as a warehousing facility, consistent with City policy regarding trip credits for previous uses. See also Response 16.7.

Comment 16.28:

Page 14 The description of public transit service in the project vicinity gives the impression that the site is well served by public transit. It claims that the two bus lines adjacent to the project site "offer extensive access to adjacent South Bay communities", but these two lines only provide service at half hour headways and

one provides no midday, night or weekend service, hardly providing extensive public transit access. The limited transit access is significant to the traffic analysis because in the mitigation measures section of the DEIR, the claim is made that Transportation Demand Management programs will reduce trip generation by 15 percent, with no commitment by the project applicant to enhance transit service.

Response 16.28:

In order to reflect a worst case, no reduction in traffic volumes was assumed to accompany the TDM program in the mitigation effectiveness analysis. Thus, the with-mitigation scenario results are not dependent on any appreciable transit ridership.

Comment 16.29:

Page 21 There are several comments applicable to the trip generation formulas applied to the proposed project land uses. Two of the formulas contain errors. The daily trip formula for Industrial Park should not include the Ln and should read "T=4.949(A) + 765.587." The daily trip formula for Office Park should include a Ln and should read "Ln(T) = 0.835Ln(A) + 3.435." These errors should be corrected.

Response 16.29:

The text listing the formulas cited by the commentor contain the identified typographical errors, which have been corrected. See Corrections and Additions Nos. 12a and 12b. However, since the correct formulas were used for all calculations, no effect on study results and conclusions would occur.

Comment 16.30:

The source and use of the Movie Theater trip rates is questionable and could understate the trips generated by the theaters. There is no daily per-seat trip rate provided by ITE for theaters. The daily rates are based on the number of movie screens and vary from 153.33 trips per screen for the one theater studied on a weekday to 529.47 trips per screen based on three theaters studied on a Saturday. The PM peak hour trip rate use in the analysis is the average rate based on two studies conducted by ITE. The average rate is 0.06 trips per seat, but the range

of the two studies was 0.04 and 0.09. Given the higher-than-average interest in movie going in southern California, it could be argued that something above the average of two studies should have been used. It would probably have been more reasonable to develop assumptions regarding the movie screening schedules and develop an estimate of peak hour trips. For example, if the theater complex has 12 screens at an average seating capacity of about 350 seats, it could be estimated that during the PM peak hour three movies might be starting and three ending. At an average weekday attendance of 50% capacity (175 attendees), and assuming 2.5 persons per car, these movies would generate 210 inbound cars and 210 outbound cars (compared to the 154 in/86 out in the DEIR). The DEIR numbers are more indicative of two movies beginning and one ending during the peak hour. Is this a reasonable assumption for a 4,000 seat theater complex?

Response 16.30:

The series of detailed assumptions cited by the commentor would not necessarily be accurate for the actual development of the site. For example, attendance level for movies ending between 4:00 P.M. and 6:00 P.M. on a weekday afternoon (e.g., starting between 1:30 P.M. and 3:30 P.M.) is unlikely to be half of capacity. Use of ITE rates for all components of a multi-use site, such as the proposed project, are consistent with the standard engineering practice for traffic studies and are reflective of the normal practices for such studies within the City of Los Angeles.

Comment 16.31:

The Shopping Center and Theater trip generation potential on a weekend should be disclosed, as the trip generation of the site is likely to be highest on weekends. The ITE rates for a shopping center on a Saturday indicate that the 385,000 proposed center will generate 21,325 daily trips. The Saturday trip rates for the movie theaters indicate the potential for 6,355 daily trips (assuming 12 screens). This would result in the total site trip generation from just the retail and theater components totaling 27,680 on a Saturday 30% more than the reported trip generation for the entire 2.967 million square foot development on a weekday. The weekend peak hour trip generation potential of the site should also be disclosed and the levels of service at project access points and nearby intersections evaluated to determine if the project will require additional mitigation measures based on the weekend peak hour. The Saturday peak hour trip generation of the shopping center will be 2,095 trips and the Saturday peak

hour trip generation of the theaters will be 1,374 trips based on ITE rates (assuming 12 screens). If these peak hours coincided, the Saturday peak hour trip generation would total 3,469 trips, 92% more than the number of trips upon which the PM peak hour analysis was based. Midday conditions on weekends in the vicinity of the project are likely to be worse than those on weekdays, and this has not been disclosed to the public. Conditions during the peak shopping season would be even worse. The City of Los Angeles might want to require additional mitigation measures to reduce weekend impacts (e.g., restricting the number of simultaneous screenings or hours of matinees), but the impact [sic] have not been disclosed by the DEIR.

Response 16.31:

The commentor incorrectly states the total weekday trip generation from the site with the project analyzed in the traffic study. The correct value is 29,900 trips. This generation is greater than the level of generation which the commentor calculated for a Saturday. Further, the commentor assumed that the peak hour generation of the retail and movie theaters would coincide. This is very unlikely since the peak generation for retail uses occurs in early afternoons while movie theater peak generation occurs during evenings. In addition, ambient traffic on the surrounding streets in industrial areas, such as that surrounding the project, is lower on weekends than on weekdays. Also, see Response 16.14 for a discussion of Christmas season generation.

Comment 16.32:

The project description and its resultant traffic analysis implies that the 30,000 square feet of restaurant space proposed as part of the project is part of the shopping center. However, the project site plan (Figure 2) does not indicate an enclosed shopping center with a food court, but rather a number of stores open to the parking lot, with about seven stand-alone buildings along the arterials. If these stand-alone buildings include the 30,000 square feet of restaurant space, they should be treated in the traffic analysis as such and the trip generation potential and impacts of 30,000 square feet of stand-alone restaurants fully disclosed. Treating the 30,000 square feet of restaurants as shopping center square footage results in the estimate that they will generate 3,330 daily trips. If the ITE rates for high-turnover sit down restaurants is applied to this same square footage, they would be estimated to generate 6,160 daily trips. If they are evaluated as fast food restaurants, they would generate 16,575 trips. Thus

the impacts of the 30,000 square feet of restaurants in the proposed project can vary dramatically and should be evaluated and disclosed.

Response 16.32:

As stated on page 1230 of Trip Generation, 5th Edition, Institute of Transportation Engineers, Washington D.C., 1991: "Many Shopping Centers, in addition to the integrated unit of shops in one building or enclosed around a mall, include out parcels (peripheral buildings or pads located on the perimeter-of the center adjacent to the streets and major access points). These buildings are generally drive-in banks, restaurants or small offices." Thus, the proposed project is a typical shopping center. It should also be noted that high levels of pass-by trips and other similar phenomena substantially offset any higher trip generation which might occur from the restaurant portion of shopping centers as compared to the retail portions. See also Response 16.22.

Comment 16.33:

Page 22 In paragraph one, there is a reference to Appendix A, which separates the project trip generation by phase. Appendix A provides information on the Phase 1 of the proposed project, which includes only the theater and retail components of the proposed project. There is no discussion provided in the Appendix F, Traffic Analysis or in Section IV. H, the Transportation/Circulation impact analysis of the DEIR with regard to the impacts of Phase 1 of the project. The data included in Appendix A appears to contend that the Phase 1 shopping center and theaters will generate less traffic that the warehouses displaced from the site and that Phase 1 will therefore result in no impacts. This analysis is incorrect. As noted above, it is unlikely that the trip credits for existing uses on the site are applicable and the impacts of the project on a weekend have not been evaluated. The Phase 1 shopping center project should be separately evaluated, including its weekend impacts, so that the public and decision makers can see the project's impacts and determine which of the project mitigation measures should be required as part of the Phase 1 project.

Response 16.33:

Appendix A analyzes the increase in traffic for the Phase 1 portion of the project. The projected increase is shown on the first page of the appendix. As summarized on the fourth

page of the appendix, a total of eight significant impacts would be anticipated for the Phase 1 project. These would be at the following locations:

- Normandie Avenue and 190th Street;
- I-405 Southbound Off-ramp and 190th Street
- I-110 Northbound On-ramp and 190th Street
- I-405 Southbound On/Off-ramp and 190th Street
- Western Avenue and 190th Street
- Vermont Avenue and 190th Street
- Normandie Avenue and Artesia Boulevard
- Crenshaw Boulevard and 190th Street

A mitigation phasing program has been prepared for inclusion in the Conditions of Approval which would require the applicable improvements at these intersections to be implemented in conjunction with the Phase 1 development. See also Responses 16.7 and 16.31.

Comment 16.34:

Page 23 The project traffic generation data provided in Table 5 justifies several comments. The traffic generation for the shopping center component of the project appears to be incorrectly calculated. The application of the shopping center trip generation formulas shown on page 21 in Table 4 to 385,000 square feet (A=385) results in a daily trip generation estimate of 16,410, not 15,010, a total AM peak hour trip generation estimate of 359, not 337, and a total PM peak hour trip generation of 1,549, not 1,423 as reported in Table 5. The shopping center gross trip generation is understated by about 9%.

Response 16.34:

As is standard practice, trip generation for the shopping center component of the project was calculated based upon the entire 450,000 square foot shopping center and then adjusted to reflect the higher trip generation associated with the 65,000 square foot theater portion of the shopping center. The remaining 385,000 square foot retail/restaurant center portion was adjusted proportionally based upon the estimated traffic generation for the 450,000 square foot center and added to the projected theater trip generation to develop the total trip generation for the retail component of the project.

In order to provide a sensitivity analysis, an alternate assumption was utilized that the theater use is not part of the shopping center (i.e., that the retail/restaurant portion of the project would generate trips independently as suggested by the commentor's approach). Utilizing the levels of trip generation indicated in the comment (i.e., 16,410 daily trips, 359 A.M. peak hour trips and 1549 P.M. peak hour trips) and then adding the theater use trip generation to provide total trip generation for the retail component of the project, potential project traffic impacts were re-evaluated. This analysis indicated that the same intersections as identified for the project would be significantly impacted and that no new significant project traffic impacts would be anticipated either before or after mitigation. Therefore the study assumption changes suggested by the commentor would not change the conclusions of the traffic analysis provided for the project.

Comment 16.35:

> The ITE trip generation manual includes data on By-Pass trips for the following types of land uses; shopping centers, fast food restaurants, service stations, supermarkets, convenience markets. It does not provide any data on By-Pass trips for movie theaters. Movie theaters are a destination-oriented land use. People make plans to go to movies. They do not just decide on the spur of the moment to pull into the theater as they might decide to pull into a market or fast food outlet. The 10% reduction in theater trips assumed in Table 5 due to By-Pass trips should not be included in the project trip generation estimate.

Response 16.35:

The pass-by percentages follow standard LADOT policy as outlined in a June 26, 1996 LADOT memorandum entitled "LADOT Policy on Pass-By Trips" which establishes the industry standard for traffic studies conducted within the City of Los Angeles. This policy reflects that many pass-by trips are not "spur of the moment" decisions. It is not uncommon for people to stop off at a theater on the way home from work or to stop at a theater while on a shopping trip. These are considered pass-by trips in the same category as impulse-induced stops. Thus, the 10 percent pass-by rate is considered conservative for theater uses.

Comment 16.36:

> As discussed earlier, the inclusion of trip credits for the 2,419,000 square feet of warehouse space on the project site is questionable because it is not clear that it all still exists and that it is all generating traffic. As noted earlier, empirical data regarding the existing site trip generation should be included in Table 5, if

it is indeed generating existing trips, not a hypothetical estimate of how many trips 2,419,000 square feet of warehouse space could generate if it all existed and were all occupied. The application of this trip credit reduces project trip generation by 29% on a daily basis and 39% in the PM peak hour and results in a significant underestimation of the potential impacts of the proposed project.

Response 16.36:

See Response 16.7.

Comment 16.37:

Page 24 Table 6 provides a single directional regional trip distribution for the proposed project. This is not a realistic estimate of the project's trip distribution. The shopping and theater components of the project are likely to have a trip distribution that is more locally oriented toward the South Bay Area, whereas the office park and industrial park land uses are much more likely to have a trip distribution that is more regional in nature. Employees of the office park may commute from Orange County or East Los Angeles, but movie goers are not likely to drive that distance. There should be two separate sets of trip distribution assumptions presented; one for commute trips and one for shopping/theater trips. Using the single trip distribution may underestimate the length of trips generated by the site and could affect the air quality analysis, which is partially based on vehicle miles traveled.

Response 16.37:

Table 6 contains a summary of the overall distribution of project traffic rather than specifying basic assumptions. The actual distributions and assignments were made through the use of the computerized transportation model. This model takes into account the differences between the shopping center and employment center of the project. Thus, the separate distributions requested by the commentor are implicitly included within the study by the use of a computerized model.

Comment 16.38:

Page 25 The project traffic volumes shown on Figures 4a and 4b raise several questions. It appears that the percentage of traffic oriented toward the freeway system is 35-

41% of project trips in the AM peak hour (531 inbound trips are illustrated exiting the freeway and 59 outbound trips are shown entering the freeway on Figure 4a) and 42-49% in the PM peak hour (265 inbound trips and 527 outbound trips access the freeways in Figure 4b). An explanation should be provided as to why these percentages vary by time of day, given the single trip distribution referenced in Table 6. It also appears that the assignment of project trips to the network sends them in some very circuitous routes, which don't make sense. For example, Why [sic] does most of the project-bound traffic on the southbound San Diego Freeway exit at the ramp north of Western in the AM and none of it exits there in the PM? Why do project-bound trips exit the northbound San Diego Freeway at the Crenshaw/182nd Street exit and turn north away from the project and disappear? Why is outbound project traffic shown entering the southbound San Diego Freeway from southbound Crenshaw Boulevard? Why is no project traffic shown entering the southbound San Diego Freeway at the Normandie on-ramp, the closest southbound on-ramp to the proposed project? These questionable project trip distributions call into question the validity of the project level of service calculations and the entire impact analysis.

Response 16.38:

See Response 16.37 for an explanation of the correct interpretation of Table 6. During the morning, the model projects that the fastest route from the southbound San Diego Freeway into portions of the project, especially the office/industrial portion, will be via the off-ramp to the west of Western Avenue. Congestion patterns will be different in the afternoon such that this route will no longer be the fastest method of accessing the project site. Trips exiting the northbound San Diego Freeway at the Crenshaw Boulevard off-ramp are those which entered the freeway one to two miles away at the Normandie Avenue and Western Avenue interchanges. Thus, the commentor is incorrect in assuming that these are "project-bound" trips. The commentor makes the same mistake in assuming that southbound Crenshaw Boulevard traffic entering the freeway is "outbound" from the project. The 25 A.M. peak hour trips and 221 P.M. peak hour trips entering the southbound San Diego Freeway at Normandie Avenue are not illustrated in Figure 4 since the unsignalized intersection of the ramp and Normandie Avenue is not a study location. The project distribution and assignment projected by the computerized model were reviewed by LADOT and the results are considered reasonable.

Comment 16.39:

Page 27 The parking analysis suggests that the DEIR has evaluated the parking demand, but the analysis does not assess peak parking demands, it assesses the code requirements. This analysis suggests that if the project provides the amount of parking required by code, then the peak parking demand will be satisfied. This assumes that the code accurately reflects peak parking demands. The ITE publishes a Parking Generation Manual similar to the Trip Generation Manual used by the DEIR authors to calculate the project trip generation. Formulas to calculate peak parking demands are published by land use. The peak parking demand formulas for weekends for the three relevant land uses are:

Theater: $P = 0.50(X) - 322.0$, where X = number of seats
Restaurant: $P = 36.73(X) - 150.0$, where X = 1,000 square feet
Shopping Center: $Ln(P) = 1.261Ln(X) - 0.365$, where X = 1,000 square feet

Applying these formulas to the proposed project results in the following peak parking demands:

Theater:	1,678
Restaurant:	952
Shopping Center:	1,141
Total Stand Alone Parking Demand =	3,771

This peak stand alone rate of 3,771 spaces compares to the 2,520 spaces reported in the DEIR as the sum of the stand alone City code requirements. The DEIR should be modified to provide an assessment of the parking demands on weekdays, weekends and at the peak holiday shopping season. The DEIR should also disclose how this peak parking demand compares to the proposed supply of parking. The DEIR Appendix F does not disclose the number of parking spaces provided by parcel or phase of development, so it is impossible to know if parking will be adequate or not.

Response 16.39:

Please see Response 16.13. The ITE formulas suggested by the commentor are not valid for this project. For example, while the project is proposed to have 4,000 theater seats, only one site in that study had over 2,000 seats and that was only approximately 3,000 seats. The

formula provides unreliable estimates outside the range of studies performed (e.g., the formula implies that facilities of 644 seats or less require no parking spaces). Likewise, the restaurant formula was based on three family restaurants of 5,000 to 6,000 square feet and implies that restaurants of under 4,000 square feet require no parking spaces. This formula is not valid for a set of multiple restaurants totaling up to 30,000 square feet. The ITE formulas and rates used to estimate the trip generation for the movie theaters utilized a larger and more diverse database which was more applicable to this site in that it included similar size facilities. The ITE shopping center formulas for both parking and trip generation are applicable to projects of this size and are based on hundreds of studies. Further, it should be noted that ITE formulas result in a lower demand estimate for parking in the retail portions of the site. Thus, it was considered more conservative to use the City code requirement instead of the ITE shopping center parking demand formula.

Comment 16.40:

Page 27 The description of project access points discusses new driveways on 190th Street and Normandie Avenue, but details of the number of driveways, locations of driveways and peak hour turning movements at the driveways are not provided. Additional details are required to assure the public that these driveways will operate at satisfactory levels of service in the peak hours on typical weekdays, weekends and at the peak holiday shopping season.

The project description assumes that new railroad crossings will be approved as access points to the proposed project. Are these new access points assured? Has the railroad and the Public Utilities Commission granted approval for these new railroad crossings? If no such formal approval has been obtained, the project traffic analysis should be re-analyzed assuming only access at existing access points, so the public can be assured that the concentration of project-generated traffic at a reduced number of driveways will work satisfactorily.

Response 16.40:

All major driveways along 190th Street are analyzed in the traffic study. See Response 16.14 for a discussion of worst case driveway conditions along Normandie Avenue. Except for the ongoing demolitions, no part of the project has been approved. Completion of the Environmental Impact Report is a necessary step to receiving Public Utilities Commission approval of the railroad crossings.

Comment 16.41:

Page 28 The project proposes six signalized access points, four of which would be new or relocated signals. The traffic analysis should quantify the impacts of these new traffic signals. Warrants for the signals should be provided to show that they are justified. The impact of the new signals on traffic progression along 190th Street and Normandie Avenue should be assessed. The levels of service at the new signals should be included in the traffic analysis so the public knows how they will operate and decision makers can determine whether or not additional mitigation measures are required at these new signalized intersections. Two of the four project access points for which level of service calculations were performed were shown to operate at LOS F and required mitigation. Information should be provided for the other two signalized access points. As noted earlier, the driveways and signalized access points should also be evaluated for the peak holiday season. The 190th Street/Project roadway intersection is described as operating with a relocated traffic signal. The DEIR should disclose the location from which this traffic signal is being relocated and should assess the secondary impacts of this signal relocation.

Response 16.41:

The locations proposed for the signals have been reviewed by LADOT district operations and design staff. This review has indicated that the proposed signals can be accommodated without undue impacts on signal progressions. As outlined on page 28 of the traffic study, each is considered necessary. Two of the signals are existing signals. A third was originally planned to be a relocated signal, but the proposed modifications to the tract map have eliminated the need to relocate this signal. A fourth signal is at the intersection of a freeway off-ramp and a major highway. This is considered an appropriate location for a signal. The final two locations are along Normandie Avenue. Both signals are immediately adjacent to proposed rail crossings and thus are needed for safety reasons. Since review by LADOT staff indicates that these signals can be accommodated within the signal system and all are considered necessary for safety or capacity reasons, no further analysis is appropriate or necessary.

Comment 16.42:

Page 29 The discussion of the model used to forecast traffic should be clarified. The text states that the City of Los Angeles General Plan Framework model was the basis for the travel forecasts in this DEIR. The text then discusses the SCAG/LARTS

model's ability to forecast HOV lane demands and transit ridership. The Framework model does not have the ability to explicitly forecast HOV volumes and does not include a transit network, so it is confusing as to why this discussion is included in the DEIR. It implies that HOV and transit forecasting was done, but it is not clear that was the case. The text notes that the Framework model does not provide the level of detail necessary to forecast individual turning movements at specific intersections with acceptable precision. The DEIR does not disclose the methodology that was used to develop intersection turning movements. Were they taken directly from the model or was the model used to forecast growth in traffic which was then added to existing turning movements counts. The methodology is not adequately described to allow a reviewer to ascertain its validity.

Response 16.42:

The baseline model prepared by SCAG and LARTS produces forecasts of trip making by mode for the entire Southern California region. These forecasts included consideration of transit and HOV facilities throughout the area. The trip generation estimates from this regional model, in turn, formed the basis for the Citywide Framework model. The Framework model was modified to reflect the proposed project land uses, the related projects land uses, and particular configuration of study intersections. This refined model was used to forecast the growth increment for each turning movement at each study intersection. This growth was then added to counts of existing traffic volumes to determine future conditions with and without the project.

Comment 16.43:

Page 35 The "without project" traffic volumes shown on Figures 6a and 6b illustrate that the northern portion of the project site is not forecast to generate traffic without the proposed shopping center/theater project and that the Phase 1 of the project should not receive any credit for displaced warehouse space. The main driveway to the shopping center portion of the project is shown to have zero movements into/out of the site in Figures 6a and 6b. This is further confirmed by comparing the volumes on Figures A-1 a and b to those on Figures A-2 a and b in Appendix A, where the Phase I impacts are addressed. The "without project" forecasts are identical to the "with project" forecasts at the three project access points which do not serve the shopping center and the shopping center trips are added at the single driveway on 190th Street which is included on these

Figures. The Phase I traffic analysis should not include trip credits for displaced traffic.

Response 16.43:

The retail project driveway opposite the San Diego Freeway off-ramp at 190th Street does not currently exist and would not be constructed under the without project scenario. Thus, the without project scenario reflects only the use of the three existing site access roadways. All three existing access points are connected to the entire site by internal roadways. Further, one of the existing access roads intersects with 190th Street - the northern boundary of the site. Traffic is shown using this roadway in the without project scenarios. Both the Phase 1 and buildout analyses accounted for the majority of the retail center traffic utilizing the new main driveway, with smaller amounts utilizing the other roadways. Thus, approximately the same amount of traffic will utilize the three existing site roadways with or without the Phase 1 project.

Comment 16.44:

Page 36 One of the key conclusions of the traffic analysis on page 36 reads "the proposed project, prior to mitigation, could have significant traffic impacts at thirty intersections during the morning and/or evening peak hours." This represents three fourths of the intersections evaluated and illustrates the magnitude of the traffic impacts, associated with the proposed project, even given the fact that the trip generation calculations include a questionable trip credit which reduces the peak hour trip generation by 39%.

Response 16.44:

The comment is acknowledged and will be forwarded to the decision-makers. However, as noted in previous responses, the use of trip credits for this project is consistent with City policy and appropriately applied for this project.

Comment 16.45:

Page 42 Table 11 shows that the area freeway system will be heavily congested with or without the project and that the project will significantly negatively impact two freeway mainline segments on the San Diego Freeway and one mainline segment on the SR 91 Freeway, in spite of the fact that project trip generation has been

reduced by 39% through trip credits. The text states, "the project will add incrementally to these insignificant cumulative impacts." What does this mean? The text then states, "the project will have significant impacts at up to four locations during the morning peak hour and in the opposite direction at the same four locations in the PM peak hour." This statement is not consistent with the data presented in Table 11. Which is correct? The final sentence on this page states, "These will be addressed by the overall Congestion Management Program (CMP) improvements, such as those included in the mitigation section of this report." What does this mean? There is nothing in the mitigation section of the DEIR which refers to CMP improvements and there are no mitigation measures proposed for the freeway segments. According to the discussion on page 29, the background traffic forecasts were based on a traffic model that includes all future freeway improvements included in the SCAG/LARTS Model and/or City of LA General Plan Framework Model. The DEIR should disclose that the significant impacts on the freeway system identified as attributable to this project will not be mitigated because the freeways were assumed to be fully built out in the baseline forecasts.

Response 16.45:

Page 42 contains typographic errors and should read "The project will add incrementally to these significant cumulative impacts" and "The project will have significant impacts at up to three locations in the morning peak hour and in the opposite direction at two of these same three locations in the PM peak hour". These corrections are included in the Final EIR. See Corrections and Additions No. 12c. Table 11 contains accurate information concerning the impacts on area freeways of the project and cumulative development. The mitigation measures referred to on page 42 include the extensive set of recommended roadway improvements. Responses 2.2 and 16.20 discuss the adequacy of these improvements with regard to the requirements of the CMP. The reader is referred to the Congestion Management Program analyses prepared by the Metropolitan Transportation Authority for a discussion of the ability of the CMP to achieve acceptable conditions. Please also note that Table 11 does not include the assumption of any capacity increases along the analyzed freeway segments and thus, does not necessarily represent the "fully built out" conditions for the freeways. The freeway analysis also reflects only the baseline trip reduction measures and surface street improvements and, therefore, significantly lower volumes may be encountered than are projected in Table 10.

Comment 16.46:

Page 45 The traffic analysis suggests that the congestion on the freeway mainline will result in back-ups that will extend onto the on-ramps. It concludes that this eliminates the need to study the ramps, when it should have concluded that this requires the study of the implications of the blockage of the on-ramps in terms of the potential diversion of project traffic to alternate arterial routes and the further worsening of arterial intersection levels of service that this will cause.

Response 16.46:

The model fully accounted for potential congestion on the freeway mainline and interchanges if mitigation is not implemented. Thus, any potential diversion onto the surface streets was accounted for in the model growth projections used in the study. Also, the commentor mischaracterized the traffic study discussion in that no conclusion was made that freeway mainline congestion will exist with implementation of all mitigation, including the measures contained in the CMP.

Comment 16.47:

Page 46 The mitigation measure related to the City of Los Angeles TDM Ordinance should be revised to read, "It [the Ordinance] *shall* be followed in the design and construction of the project site and buildings."

Response 16.47:

The requested revision has been included in the Final EIR. See Corrections and Additions No. 12d.

Comment 16.48:

Page 47 It is unrealistic to forecast that 15 percent or more of the peak hour traffic generation of the industrial park/office park component of the project will be eliminated, without any specific commitments from the project applicant to implement some Transportation Demand Management measures.

Response 16.48:

The comment is acknowledged and will be forwarded to the decision-makers. The analysis of mitigation effectiveness conservatively did not assume that any trip reduction would occur. However, other sites implementing the City and South Coast Air Quality Management District (SCAQMD) required programs have achieved 15 percent or greater reductions.

Comment 16.49:

Page 47 The bus transit improvements mitigation measure is ineffective as stated and would be difficult to monitor through the mitigation monitoring program without a specific commitment as to how the project applicant is going to improve transit service. What is meant by the phrase "this project should work with the appropriate transit districts to improve transit service to the site?" A specific program to improve transit service should be identified and the specific actions that the project applicant will take to support the services (e.g., subsidization of employee bus passes) should be identified.

Response 16.49:

The project Applicant may not be the employer of the vast majority of the site employees. Likewise, neither the project Applicant nor the City operates the buses providing transit service to the site. Therefore, commitment to specific actions, beyond provision of adequate site pedestrian facilities, is not considered feasible. Rather, existing City and SCAQMD regulations combined with proactive planning by the project proponent provides the most feasible framework for reducing automobile trips to and from the site.

Comment 16.50:

Page 52 The DEIR authors do not note whether any attempt has been made to coordinate the mitigation measures with the adjacent jurisdictions and which if any are acceptable to the adjacent jurisdictions. The public and decision makers have no way of knowing the likelihood as to which mitigation measures outside the jurisdiction of the City of Los Angeles will be implemented. The traffic study does not even indicate which intersections and which mitigation measures are solely within the City of Los Angeles. It is impossible for the public to determine how many significant impacts are likely to remain if this project is approved.

Response 16.50:

The project Applicant has met with the surrounding jurisdictions to discuss the project and its mitigation and these jurisdictions have been afforded the opportunity to review and comment on the Draft EIR. Likewise, a copy of the Draft EIR was transmitted to Caltrans for its review and comment, and conversations have been initiated with Caltrans Permit staff. However, the surrounding jurisdictions and Caltrans have not been able to definitively accept or reject any of the proposed mitigation measures at this time. The EIR reflects this status.

Comment 16.51:

As demonstrated by the foregoing comments, the DEIR is significantly deficient in several important areas - most notably, traffic -- which we believe requires the revision and recirculation of the DEIR.

Response 16.51:

The preceding responses (16.1 through 16.50) demonstrate that no significant new information as defined in Section 15088.5 of the CEQA Guidelines has been added to the Final EIR. Section 15088.5 defines new significant information to include:

- A new significant environmental impact that would result from the project or a new significant impact associated with a new mitigation measure added after the Draft EIR was circulated;
- A substantial increase in the severity of an environmental impact that would result unless mitigation measures are adopted to reduce the impact to a level of insignificance;
- A feasible project alternative or mitigation measure considerably different from others analyzed is identified that would clearly lessen the significant environmental impacts of the project, but the project's proponents decline to adopt it;
- Concluding that the Draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

Based upon the preceding responses (Nos. 16.1 through 16.50) as well as responses to prior comments (see Response 15.1 in particular), none of the above conditions have been met. The only new mitigation measures added in the Final EIR were provided by the Fire Department and were not included in the Draft EIR only because no response to the Notice of Preparation was received from the Fire Department. No new significant impacts which would require new

mitigation measures were identified from comments received on the Draft EIR. Therefore, the lead agency concludes that, although revisions to the Draft EIR have been incorporated in response to comments submitted on the Draft EIR, these revisions merely clarify or amplify or represent insignificant modifications to the EIR and recirculation of the EIR is therefore not required. The comment will be forwarded to the decision-makers for consideration.

IV. ORGANIZATIONS AND PERSONS NOT RESPONDING TO THE DRAFT EIR

A. CITY OF LOS ANGELES

Mail Stop 225
Hon. Rudy Svorinich, Jr.
15th District
Room 236, City Hall

Darryl Fisher
Zoning Administration
221 N. Figueroa St., Room 1540
Mail Stop 395

Building and Safety Department
Chief, Building Bureau Co-ordinating Division
Room 417, City Hall
Mail Stop 115

Bureau of Engineering, Land Dev./Map. Div.
Attn: Frank Bonoff
634 S. Spring St., Suite 400
Mail Stop 901

Consultant - Wastewater Program
Management Division
Bureau of Engineering
650 S. Spring St., Suite 1100
Mail Stop 549

Fire Department
Hydrant Unit
Room 920, City Hall East
Mail Stop 250

Crime Prevention Unit
Los Angeles Police Department
Parker Center
Mail Stop 400

Environmental Affairs
Attn: Karin Smith
201 N. Figueroa St., Suite 200
Mail Stop 177

Bureau of Engineering,
Environmental Management Section
Attn: Ara Kasparian
650 So. Spring St., Suite 600
Mail Stop 939

Bureau of Sanitation (Dept. of Public Works)
Delwin A. Biagi, Director
Room 1410, City Hall East
Mail Stop 520

Water and Power Department
111 No. Hope Street, Room 1432
Los Angeles, CA 90012
R. Simms (Water Systems)
Mail Stop 800

City Clerk
Environmental Section
Room 395, City Hall
Mail Stop 160

Department of Cultural Affairs
Attn: Rowella H. Louie
433 So. Spring Street, 10th floor
Mail Stop 380

GMC Neighborhood Assoc.
c/o Dick Higashi
16207 S. Bonsallo
Harbor Gateway
Gardena, CA 90247

Bob Rogers
South LA/Metro Planning Division
221 S. Figueroa St., 3rd Floor
Mail Stop 397C

B. CITY PLANNING COMMISSION

City Planning Commission
221 N. Figueroa St., 16th Floor
Mail Stop 395

C. SPECIAL DISTRICTS

South Coast Air Quality
Management District
Local Government CEQA
Attn: Cindy Greenwald
21885 Copley Drive, 2nd Floor South
Diamond Bar, CA 91765

D. COUNTY OF LOS ANGELES

County of Los Angeles
Department of Regional Planning
Impact Analysis Section
320 West Temple Street, Room 1354
County Messenger Service
(213) 974-6461

Los Angeles County
Department of Public Works
Attn: Planning Division
900 S. Fremont Avenue
Alhambra, CA 91803

County Clerk, EIR Desk
12400 Imperial Highway
Norwalk, CA 90650

E. STATE OF CALIFORNIA

California Regional Water
Quality Control Board
Attn: Wendy Phillips
101 Centre Plaza Drive
Monterey Park, CA 91754

F. OTHER ORGANIZATIONS

Rosecrans Neighborhood Assoc.
738 W. 149th St.
Harbor Gateway
Gardena, CA 90247

City of Torrance
David Ferren
Planning Department
3031 Torrance Blvd.
Torrance, CA 90802

Harbor Gateway
Torrance Comm. Assoc.
20900 LaSalle Ave.
Torrance, CA 90501

City of Carson
Patrick Brown
Planning Department
701 E. Carson
Carson, CA 90745

135th St. Neighborhood Assoc.
14153 Ainsworth St.
Harbor Gateway
Gardena, CA 90247